

JOHN L. RUSSO
ATTORNEY AT LAW

COUNSEL
Milton Florez, Esq.
Paul Testerverde, Esq.

J.L. Russo, P.C.
31 · 19 Newtown Avenue, Suite 500
Astoria, New York 11102
Tel: 718 · 777 · 1277
Fax: 718 · 204 · 2310
Email: JLRussoPC@Gmail.com

PARALEGAL
Maria Nunez, B.S.

April 7, 2026

Via E-Mail and ECF
Honorable Robert A. Kirsch
United States District Judge
United States District Court
District Of New Jersey
402 East State Street
Trenton, New Jersey 08608

Re: United States v. Damaris Valerio
Docket No.: 25 CR 00414

Your Honor:

This office represents Damaris Valerio, the defendant in the above referenced matter, which is scheduled for sentencing before the Court on April 14, 2026. We write to request a further brief adjournment of sentencing in this matter to a **date prior to May 26th** as the undersigned has been scheduled for a medical procedure on April 14th which has proven quite impractical to reschedule. I am available, generally, **any days prior to May 26th, but not** April 14th – 17th, April 22nd – 24th, May 4th -7th and May 11th.

The Court will recall, that this matter was adjourned from March 17th, given the recent opinion of the District Court (Brann, DCJ) which found the then current configuration of the U.S. Attorney's Office in New Jersey to be unlawful as constituted. See, *United States v. Naviwala*, Cr. No. 24-00099 [ECF Nos. 317-18], and *United States v. Torres*, Cr. No. 24-378 [ECF Nos. 120-21].

While it appears that the U.S. Attorney's Office has corrected its personnel issues, given the foregoing, we respectfully request an adjournment of sentencing a date prior to May 26, 2026 as outlined above, and as convenient for the Court.

The Court's consideration of this request is respectfully appreciated. Thank you.

Yours truly,

/s/ *John Russo*

John L. Russo

JLR:mn

Cc: AUSA Fatima Cano