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March 15, 2022

Hon. Katharine H. Parker
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Rafael Martinez,
22 Mag. 1988 (S.D.N.Y.)

Dear Judge Parker:

We represent Rafael Martinez in the above-captioned case and seek an additional one-week extension of the date by which Mr. Martinez must satisfy his outstanding bail conditions. The government consents to this request.

Mr. Martinez was arrested on February 28, 2022 and was presented on a Complaint remotely before Your Honor on March 1. The Court approved the following bail package: (1) a $10 million personal recognizance bond; (2) cosigned by three financially responsible people; (3) secured by four designated properties; (4) with travel restricted to the Southern and Eastern Districts of New York and the District of New Jersey; (5) the surrender of any firearms; (6) supervision as directed by Pretrial Services; and (7) the surrender of any travel documents. Your Honor allowed Mr. Martinez to be released upon his own signature with the balance of the conditions to be met by March 8. On March 8, Your Honor granted Mr. Martinez an additional week to satisfy these conditions upon the consent of the government.

Although Mr. Martinez is nearly finished with this process, a brief period of additional time is needed. Accordingly, we request an extension of one week to satisfy the

remaining conditions of release. We have conferred with Assistant United States Attorney Micah Ferguson, who consents to this application.

Respectfully submitted,

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO, P.C.

/s/ Telemachus P. Kasulis
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