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April 27, 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 the Court's permission for Mr. Martinez to travel on two brief trips. This application is made without objection by Pretrial Services or the government.

Mr. Martinez has been at liberty since he was arrested on February 28, 2022 and presented before Your Honor on March 1. Mr. Martinez's bond currently permits him to travel within the Southern and Eastern Districts of New York, the District of New Jersey, and the District of Connecticut.

On May 5, Mr. Martinez seeks to travel to Chicago to help his daughter select an apartment and settle in for her university medical fellowship. He would return on May 7. On May 10, Mr. Martinez seeks to travel to Las Vegas with his family on a graduation trip for his daughter. He would return on May 11. This trip was booked and paid for months ago, and in advance of Mr. Martinez's arrest in this case.

On April 26, we advised Mr. Martinez's Pretrial Services Officer and the assigned Assistant United States Attorney of this proposed travel, and each indicated that they had no objection to this application.

We thank the Court for its consideration of this matter.

Respectfully submitted,

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO, P.C.

/s/ Telemachus P. Kasulis
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cc: AUSA Micah Fergenson (via email)