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July 12, 2022

Hon. Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Rafael Martinez,
22 Cr. 251 (LJL)

Dear Judge Liman,

We represent Rafael Martinez in the above-captioned case and seek the Court's permission for Mr. Martinez to travel on a brief trip outside the bail limits imposed by this Court.

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

Mr. Martinez seeks to travel to California for several days to participate in the Stanford University executive program. On July 15, 2022, he is scheduled to depart from Newark, New Jersey at 6:30am and to arrive in San Francisco, California at 9:25am. He plans to stay at the Fairmont hotel in San Francisco. He is scheduled to depart from San Francisco on July 18 at 9:00pm and to arrive in Newark on July 19 at 5:15am. Mr. Martinez's participation in the program was approved in November 2021 and this trip was booked in advance of Mr. Martinez's arrest in this case.

On June 30, 2022, we advised Mr. Martinez's Pretrial Services Officer and the assigned Assistant United States Attorney of this proposed travel. On July 11, Pretrial Services indicated

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that they had no objection to this application, and the government indicated that it takes no position.

We thank the Court for its consideration of this matter.

Respectfully submitted,

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