U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

December 27, 2022

BY ECF
The Honorable Lewis J. Liman
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

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

Dear Judge Liman:

The Government respectfully submits this letter motion to request, on consent of the defendant, an adjournment of the motions hearing currently scheduled for January 19, 2023. The undersigned (AUSA Fergenson) will be participating in a criminal trial that is now scheduled to begin, following an adjournment, on January 18, 2023, in *United States v. Billy Ortega*, 22 Cr. 91 (RA).[1] Accordingly, the Government respectfully requests an adjournment to a date convenient for the Court in the weeks of February 6, 2023, or February 13, 2023. If the Court is inclined to grant an adjournment, the parties are available to confer with the Court's chambers staff regarding a specific date and time that work for all parties.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

by: Micah Fergenson
Micah F. Fergenson
Katherine Reilly
Assistant United States Attorneys
(212) 637-2190/6521

cc: Defense Counsel (By ECF)

[1] This Court scheduled the January 18 motions hearing at the August 11, 2022 pretrial conference. At that time, the trial in *Ortega* was scheduled for November 28, 2022; on October 14, 2022, trial was adjourned to January 18, 2023, and is currently expected to proceed to trial on that date.