USA

vs.

Medard Ulysse

Civil No. RDB 21-054 & 22-335 **Court's Exhibits**

Exhibit No.	Identification	Admitted	Description
1	01/24/2025	01/24/2025	Letter from Richard Bardos

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23 January 2025

Richard D. Bennett, Judge
United States District Court for
the District of Maryland
101 W. Lombard Street
Baltimore, Maryland 21201
VIA ECF

RE: *United States v. Medard Ulysse, et al.*
Case Nos. RDB-21-054 and 22-335

Dear Judge Bennett:

Sentencing is set for tomorrow at 11:00 a.m. before Your Honor. I am writing to alert the Court to an issue that was brought to my attention this morning that has the potential to cause a rescheduling of this matter.

Mr. Ulysse was initially set for sentencing on December 11, 2024. At that time, the defendant asked for new counsel and the Court immediately sent Mr. Ulysse and me to Judge Aslan for an attorney inquiry hearing. Judge Aslan found no grounds for new counsel and we returned to your courtroom and the Court set January 24, 2025 as the new date, to permit Mr. Ulysse time to hire counsel if he chose.

Following the inquiry hearing, I told Mr. Ulysse that I would arrange a meeting with him to address certain issues from that hearing, as well as specific issues to be presented at sentencing. Unfortunately, due to involvement in a variety of other matters, I forgot about the meeting and did not meet with the defendant. Mr. Ulysse called me this morning to remind me of my statement and I realized that he was correct and that I had not done what I had said I would. I believe that such a meeting is important for proper representation of this defendant.

I do not know whether the Court under these circumstances would reschedule the hearing. I expect that Mr. Ulysse will request a new date. I wanted to make the Court aware of this issue as soon as possible.

Thank you for your attention to this matter.

Very truly yours,

Richard Bardos, Of Counsel

RBB:rb