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October 9, 2018

BY ECF

Hon. Nicholas G. Garaufis
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Raniere et. al.
18 Cr. 0204 (NGG)

Dear Judge Garaufis:

Robert Soloway and I represent Nancy Salzman in the above-referenced matter. I write seeking additional time to respond to the government's motion of October 3, 2018, which seeks an Order permitting the government to distribute to Ms. Salzman's co-defendants full forensic copies of the contents of electronic devices (computers, external hard drives, smartphones, and thumbdrives) which were seized from our client's home pursuant to search warrant on March 27, 2018, and to do so prior to full execution by the government of the search warrant.¹

At a status conference of October 4, we informed the Court and government of our hope that by Monday, October 8, we would be able to propose a compromise with the government that would accommodate the interests of both sides. We continue to believe that an accord is possible, but we continue as well to work through the many relevant authorities in what is a complex and fast-evolving area of law to achieve a workable outcome that will protect our client's basic rights, and at the same time, will address the government's legitimate interests and concerns.

For these reasons, we seek an extension until Thursday, October 11 by close of business, to reach an agreement with the government, or to inform the Court of our inability to do so, and to

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In this context, fully executing the search warrant by the government refers to processing the devices to cull from the seized content that which is within the scope of the warrant, and that which is not. The latter category of seizures is not subject to the government's Rule 16 disclosure obligations, and is within the scope of Nancy Salzman's protected privacy rights.

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jointly propose a short briefing schedule. I note too that we have an appointment to discuss these matters with the government scheduled for tomorrow at 4:00 PM.

If your Honor has any questions regarding this application, we respectfully ask that you advise the parties. Thank you very much for your attention.

Respectfully submitted,



David Stern

cc: All Counsel by ECF

DS:sc