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October 11, 2018

BY ECF

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

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

Dear Judge Garaufis:

As noted in my October 9 letter, the parties are seeking to resolve the issues raised in the Government motion filed October 3, which seeks an Order permitting the government to distribute to Ms. Salzman's co-defendants full forensic copies of the contents of electronic devices which were seized pursuant to search warrant from our client's home. Both sides exchanged ideas yesterday during a telephone conference which we advised the Court we would convene. We came away perceiving that there remains work to do to reach consensus, but also with the feeling that an agreement is not out of reach.

Since both sides hope to avoid further litigation on this topic, we plan to engage in additional efforts to resolve through negotiation the matters at issue. Thus we ask for a further extension until Friday October 19 to come to an agreement; or, if we cannot, to jointly propose a short briefing schedule on the motion.

If your Honor has any questions regarding this application, please contact the parties. Thank you very much for your attention.

Respectfully submitted,



David Stern

cc: All Counsel by ECF
DS:sc