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RACHEL PERILLO

February 17, 2021

Via ECF
Hon. Nicholas G. Garaufis
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Nancy Salzman
18 Cr. 204 (NGG)

Dear Judge Garaufis:

I together with Robert Soloway represent Nancy Salzman in this matter. I write with the consent of AUSA Tanya Hajjar on behalf of the government to request a temporary modification of Ms. Salzman's conditions of release to allow her to have foot surgery. Specifically, we ask that Ms. Salzman be allowed to remove her location monitoring bracelet on Friday February 19, 2021, and have it replaced on Monday, February 22, 2021 or as soon thereafter as practicable.

Ms. Salzman has been subject to pre-trial supervision for approximately three years, and during that time has been fully compliant with her conditions of release. On February 19, 2021, she is scheduled to have foot surgery at Samaritan hospital. A letter to that effect is enclosed. Her surgery, which will be performed by Dr. Sam Dellengaugh, requires the removal of her ankle monitor. For this reason we seek a temporary modification of her conditions of release allowing her to remove the ankle monitor on Friday, February 19, and have it replaced on Monday, February 21. This modification will allow her to have the needed surgery and will result in only a brief interruption of her location monitoring during which time, under any circumstances, she will be incapacitated. I am informed that Kendra Rennie, Ms. Salzman's pre-trial officer consents to this request.

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For the foregoing reasons we seek the temporary modification of the conditions of release detailed above. If the Court has any questions regarding this application please contact my office

Respectfully submitted,

/s/
David Stern

APPLICATION GRANTED. SO-ORDERED. /s/ Nicholas G. Garaufis, U.S.D.J. Hon. Nicholas G. Garaufis Date: February 18, 2021
