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July 8, 2021

By ECF

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

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

Dear Judge Garaufis:

Together with David Stern, I represent Nancy Salzman in the above-captioned matter. We respectfully request, without objection of the government, modification to the Court's ECF order of yesterday which fixes a date for sentence and a schedule for the parties' submissions relating to that proceeding. Our application is based on the following circumstances: First, I have plans for a pre-paid family vacation on Fire Island, the term of which begins in July and extends through August 7. Additionally, the Court's schedule for submissions is extremely tight under the circumstances of our client's complex sentencing case, and the extensive submission being prepared.

Additionally, the schedule ordered for our client differs materially from that ordered for all other defendants in this case. No other defendant has been directed to file PSR objections and a full sentence submission on the same date, as has been directed in our client's matter. Rather, those submissions have been serially filed by the parties, beginning with defense objections, government response, and then defense reply, followed thereafter by a separate schedule for the parties' sentence submissions. We respectfully request the same submission structure for our client, and note such protocol importantly allows for defense efforts to seek consensus with United States Probation and the government as to PSR objections before calling for final sentence submissions to the Court.

We have no objection to filing our objections to the PSR, as ordered yesterday, on or before July 16, nor to the remainder of the schedule as it relates to submissions directed to the PSR's final content, concluding, as currently scheduled, July 29. But we request that our initial sentence submission be due to the Court one week thereafter, on or about August 5, rather than the current July 16 date, to be followed by reasonable time for response and reply, and a date for sentence thereafter.

We thank the Court very much for consideration of these matters.¹

Sincerely,

Robert A. Soloway

Robert A. Soloway

cc: AUSA Tanya Hajjar
(By ECF)
RAS:sc

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I note that AUSA Hajjar advises me that she is unavailable for sentence proceedings during the period September 13th through 24th.