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July 2, 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. Without objection of the government, per AUSA Tanya Hajjar, I write to request a bail modification as follows: Ms. Salzman's youngest daughter, Michelle, is due to give birth on August 1, 2021, although her doctors believe the birth may be up to two weeks early as Michelle has already begun having contractions. It is requested that Ms. Salzman's bail conditions be expanded to permit her to travel to and to remain with Michelle at the hospital during labor and delivery, and to thereafter reside with her daughter (who lives near Nancy in Clifton Park, New York) including staying overnight with her daughter as desired during the infancy of the child so as to help her daughter and son-in-law, and to bond with her first grandchild.

All information as to Ms. Salzman's location must be on notice to her Pre-Trial Services Officer, Kendra Renny, who shall be kept fully informed as to Ms. Salzman's location. In all other respects, Ms. Salzman's conditions of release shall remain as they currently are. Thank you very much for your attention to this matter.

Sincerely,

Robert A. Soloway

Robert A. Soloway

cc: AUSA Tanya Hajjar
(By ECF)

RAS:sc