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May 10, 2024

Honorable Richard M. Berman
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: United States v. Keonne Rodriguez,
24 Cr. 082 (RMB)**

Dear Judge Berman:

We write on behalf of Keonne Rodriguez, the defendant in the above-referenced matter. As described below, Mr. Rodriguez respectfully requests that the Court grant two applications: (i) an adjournment of the May 14 status conference to a date and time convenient for the Court; and (ii) a modification of Mr. Rodriguez's bail conditions to extend the time within which he must comply with the final remaining bail condition. This is the Defendant's first request for an extension of time in this case. We have conferred with counsel for the Government, who (i) take no position on the adjournment of the status conference; and (ii) do not object to the extension of time to satisfy the final bail condition.

First, Mr. Rodriguez is directed to appear for an initial status conference at 2:00 p.m. on Tuesday, May 14, 2024.¹ Unfortunately, due in part to Mr. Rodriguez's home detention in Pennsylvania and financial restrictions imposed upon release, Mr. Rodriguez has been unable to confer fully to finalize an engagement with counsel. Accordingly, we respectfully request that the Court briefly adjourn the May 14 initial status conference for a period of two weeks to a date convenient for the Court. We are hopeful the details of Mr. Rodriguez's representation, currently being discussed with the Government, will be finalized shortly. We have spoken with Mr. Rodriguez and he consents to the exclusion of speedy trial time to the next scheduled date, should the Court grant our request.

¹ Mr. Rodriguez continues to work through the process of engaging a private firm to represent him in this matter, including potentially the undersigned. As the Court is aware, the undersigned represented Mr. Rodriguez for the limited purpose of arraignment and bail in front of Judge Moses on April 29, 2024.

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Second, we also respectfully request that Mr. Rodriguez be given a one-week extension to satisfy the conditions of his bond. At his initial appearance on April 29, Mr. Rodriguez's wife agreed to secure the \$1,000,000 bond with property owned by Mrs. Rodriguez located in Pennsylvania. Judge Moses directed that the property be posted by May 14, 2024. However, the deed to the property (which is their marital home) was seized during the Government's search of the property at the time of Mr. Rodriguez's arrest. The Government only provided the deed to the property to the undersigned on May 8, 2024. Given this delay, we request that Mr. Rodriguez be allowed to perfect the bond by May 21, 2024.

We appreciate the Court's consideration of this request, and, as always, are available to answer any questions the Court may have.

Applications are granted. The conference is adjourned to 5/28/24 at 11:00 am. Time is excluded pursuant to the Speedy Trial Act for the reasons set forth in this letter.

SO ORDERED:

Date: 5/13/24


Richard M. Berman, U.S.D.J.

Respectfully submitted,

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/s/ Sean S. Buckley

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