



USA v. Colello et al

2021 | Cited 0 times | S.D. New York | June 1, 2021

June 1, 2021 By ECF The Honorable Laura Taylor Swain Chief United States District Judge Southern District of New York Daniel Patrick Moynihan Courthouse 500 Pearl Street New York, NY 10007 Re: United States v. Michael Colello and Charles Sayegh, 20 CR 613 (LTS) Dear Judge Swain,

On behalf of the parties, the Government respectfully writes to request an adjournment of the conference scheduled for June 3, 2021 to a date and time of convenience to the Court during the week of July 26, 2021 or thereafter. After communication with counsel for the defendants, the Government understands that both defendants require additional time to review discovery and anticipate that an adjournment will also allow them to advance materially discussions with the Government concerning the possibility of a pre-trial disposition. Because counsel for the defendants are not available in the two weeks prior to the week of July 26, 2021, the parties respectfully seek an adjournment to that week or thereafter. With the consent of the defendants, the Government also respectfully requests that the Court exclude time under the Speedy Trial Act from June 3, 2021 through the date of any granted adjournment of the conference pursuant to 18 U.S.C. § 3161(h)(7) on the basis that the interests of the defendants and the public in a speedy trial are outweighed here by the ends of justice served by allowing the defendants to review further the discovery in the case and to consider the availability of any pretrial motions or the possibility of any pretrial dispositions.

Respectfully submitted, AUDREY STRAUSS United States Attorney By:

Thomas John Wright Assistant United States Attorney (212) 637-2295 cc: J. Curtis Edmondson (Counsel to Defendant Michael Colello) (by ECF)

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