U.S. Department of Justice

United States Attorney
Southern District of New York

Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

June 15, 2026

BY ECF & EMAIL
The Honorable Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

SO ORDERED.

U.S.D.J. 6/16/2026

Re: *United States v. Maduro Moros and Flores de Maduro*, S4 11 Cr. 205 (AKH)

Dear Judge Hellerstein:

The Government writes, with consent of the defense, to respectfully request (1) a brief adjournment of the next status conference, currently scheduled for June 30, 2026, to July 22, 2026 at 12:00 p.m., a date and time we understand to be convenient for the Court; and (2) that time between June 30 and July 22, 2026 be excluded as to both defendants under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A). The Government understands that the adjournment is necessary to avoid scheduling and logistical issues in connection with providing safe transport and security for the current June 30 date. The Government respectfully submits that the ends of justice served by granting the requested exclusion of time under the Speedy Trial Act outweigh the interests of the public and the defendants in a speedy trial so that the Government can produce discovery, the defense can review discovery, and the defense can consider what pretrial motions it expects to make. Counsel for both defendants have informed the Government that they consent to the foregoing requests.

Respectfully submitted,

JAY CLAYTON
United States Attorney

By: /s/
Kaylan E. Lasky
Henry L. Ross
Kevin T. Sullivan
Kyle A. Wirshba
Assistant United States Attorneys
(212) 637-2493

cc: Counsel of Record (by ECF & Email)