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October 27th, 2025

Via CM/ECF
The Hon. Judge Nicholas G. Garaufis
Senior District Court Judge
United States District Court for The Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: **KEITH ALAN RANIERE v. UNITED STATES OF AMERICA**
Case No. 1:18-CR-00204
Request to Continue to Hold the 28 U.S.C. § 2255 in Abeyance

Dear Hon. Judge Garaufis:

My office represents Keith Alan Raniere (hereinafter referred to as "Mr. Raniere") in his 2255 habeas corpus petition before Your Honor which is currently being held in abeyance. This morning the government requested to file its opposition given that the Second Circuit Court of Appeals affirmed the Court's denial of Mr. Raniere's Rule 33 et al.

I respectfully request that this Court continues the stay until October 31st; at which time or prior I will provide the Court with an update and/or a request to continue the stay. Counsel is weighing appellate options, including a petition for hearing en banc or a petition for writ of certiorari, which renders the judgment non-final under FRAP 41(d)(1). I will also confer with AUSA Hajjar on the government's position regarding this and other possible considerations.

Lastly, I was going to address the Court to allow me to amend the habeas petition prior to the government's opposition. I will also further confer with AUSA Hajjar regarding this – she was previously in agreement. However, that was earlier this year.

Thank you. I can best be reached on my mobile phone, (845) 304-5312 or through email, deborah@deborahjblum.com.

Very truly yours,

Deborah J Blum

Deborah J. Blum

Via Email

cc: Joseph Reccoppa
Courtroom Deputy to
The Hon. Judge Nicholas G. Garaufis

AUSA Tanya Hajjar
United States Attorney's Office for The Eastern District of New York