



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

RCH/AXB/LZ
F. #2022R01030

*610 Federal Plaza
Central Islip, New York 11722*

October 10, 2023

By ECF

The Honorable Joanna Seybert
United States District Court
Eastern District of New York
Central Islip, New York 11722

Re: United States v. Samuel Miele
Criminal Docket No. 23-327 (JS)

Dear Judge Seybert:

The government respectfully submits this letter on behalf of all parties to request an adjournment of the status conference scheduled for October 11, 2023 in the above-referenced matter, and a corresponding exclusion of Speedy Trial time.

The defendant was arraigned on a five-count indictment charging him with wire fraud and aggravated identity theft on August 16, 2023. Following the arraignment, the parties jointly requested on August 21, 2023 that the Court enter an order pursuant to 18 U.S.C. § 3161(h)(7)(A), excluding from the computation of Speedy Trial time the period from August 21 to September 5, 2023. (ECF:14.) On September 5, 2023, the government submitted a letter informing the Court that two substantial productions of discovery had been made pursuant to Federal Rule of Criminal Procedure 16 and seeking, with the defendant's consent, an exclusion of time to facilitate both the defense's review of discovery and plea discussions. (ECF No. 18.)

The parties now write to advise the Court that the parties have continued to engage in meaningful discussions regarding a disposition of this matter short of trial and require additional time to continue and conclude such negotiations. Accordingly, the parties respectfully submit that excluding additional Speedy Trial time to facilitate ongoing plea discussions will serve the ends of justice and outweigh the best interests of the public and the defendant in a speedy trial.

The parties have conferred with the Court's deputy and understand that the Court is available on November 14, 2023, at 12:00 p.m., for a continued status conference. Accordingly, the parties jointly request that the status conference scheduled for October 11

be adjourned to November 14, 2023, and that a corresponding exclusion of Speedy Trial time be ordered under 18 U.S.C. § 3161(h)(7)(A). A proposed Order is attached for the Court's convenience.

Respectfully submitted,

BREON PEACE
United States Attorney

By: _____ /s/

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U.S. Department of Justice

By: _____ /s/

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cc: Clerk of the Court (via ECF and email)
Counsel of Record (via ECF and email)