

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

*David E. Patton*  
Executive Director  
and Attorney-in-Chief

*Southern District of New York*  
*Jennifer L. Brown*  
Attorney-in-Charge

July 30, 2020

**By ECF and Email**

Honorable Paul A. Crotty  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Joshua Adam Schulte*, 17 Cr. 548 (PAC)

Dear Judge Crotty:

With consent of the government we write to seek a two week adjournment of the August 3<sup>rd</sup>, 2020, status conference. Counsel for the defense is working on several issues including addressing the issues raised by a White Plains grand jury hearing evidence that led to the superseding indictment against Mr. Schulte. Additionally, the defense is still trying to assemble a defense team. Dr. Bellovin who is 78-years old, declines to undertake the risk associated with returning to New York City.

We understand that the Chief Judge for the Southern District of New York has or is preparing a protocol for prioritizing and scheduling jury trials and it remains uncertain as to how trials are being scheduled. While the government has stated it is trial ready on this case, the defense faces different challenges. Given the due process concerns these issues raise, we are not able to tell the court when we will be ready for trial.

We thank the court for its time and consideration.

Respectfully submitted,

/s/

Edward S. Zas, Sabrina P. Shroff, Deborah A. Colson  
Counsel for Joshua A. Schulte