

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

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March 22, 2021

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:

We write, with the consent of the government and Mr. Schulte himself, to request that the Court adjourn the retrial of this matter, currently scheduled to commence on May 10, 2021. The parties have conferred and believe that, given the health risks and logistical difficulties posed by the ongoing pandemic emergency, and the complexity of this case, a retrial in the fourth quarter of 2021 (i.e., October, November, or December), if feasible under the Court's scheduling procedures, would best serve the interests of justice, the defendant, and the public.¹

The parties are continuing to confer, and anticipate filing a proposed schedule for pretrial motions by April 9, 2021. The government also requests that the Court exclude time between now and October 1, 2021, under the Speedy Trial Act, without objection from the defense.

We thank the Court for its time and consideration.

Respectfully submitted,

/s/

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

cc: Government Counsel

¹ Counsel notes that trial dates are now being set by committees in the Southern and Eastern Districts of New York and that trial lawyers have no control over dates set by other judges. In that regard, and in the interests of full disclosure, both Ms. Shroff and Mr. Denton are counsel in a pending matter awaiting trial before the Honorable Allyne R. Ross in the Eastern District of New York.