U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

March 16, 2022

BY ECF

Honorable Jesse M. Furman
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: ***United States v. Joshua Adam Schulte*,**
S3 17 Cr. 548 (JMF)

Dear Judge Furman:

The Government writes to respectfully request permission to exceed the Court's default page limit in the Government's upcoming classified motion pursuant to Section 6(a) of the Classified Information Procedures Act ("CIPA"), due on Friday, March 18, 2022. The Court had previously ordered that "any memorandum of law filed in support of a motion or in opposition to a motion shall not exceed twenty-five pages." (D.E. 570 at 4). In view of the complexity and number of issues raised by the Government's motion, as well as the extensive procedural history of prior CIPA Section 6(a) and (c) practice in this case, the Government respectfully requests permission to file a motion of not more than 55 pages, and the Government consents to a reciprocal expansion of the defendant's response to the Government's motion.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

by: /s/
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cc: Standby counsel (by ECF and email)
Joshua Adam Schulte (by mail)