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October 1, 2021

Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Mark S. Scott*, S10 17 Cr. 630(ER)

Dear Judge Ramos:

We write on behalf of Mark Scott, the defendant, to address scheduling issues concerning Mr. Scott's Supplemental Motion for a New Trial. As the Court is aware, Mr. Scott described in his motion evidence that the Government's sole cooperating witness, Konstantin Ignatov ("Konstantin"), perjured himself at Mr. Scott's trial with respect to the destruction of a OneCoin laptop. As the Government revealed in its Opposition, Konstantin admitted to the perjury regarding the destruction of the laptop but insisted to the Government that his testimony was otherwise truthful.

Following the unsealing of the Supplemental Motion and the Government's Opposition last week, counsel for Mr. Scott has received credible information that Konstantin's perjury was far more extensive than he has admitted, and included false testimony that Irina Dilkinska attended a three-way meeting with Ruja Ignatova and Mark Scott on July 20, 2016 at OneCoin offices in Sofia, Bulgaria. Defense counsel anticipates that newly obtained documentary evidence will conclusively establish that Dilkinska was not in Bulgaria at that time.

Mr. Scott needs time to investigate this additional information concerning Konstantin's perjury and related disclosure issues.¹ Accordingly, Mr. Scott proposes submitting a Reply

¹ The Government previously informed the defense that an investigator from the Manhattan District Attorney's Office received a report that Konstantin perjured himself in June 2021 and did not share that information with the defense. Mr. Scott is also investigating whether the prosecution team disclosed all evidence available to it at the time of trial as to Ms. Dilkinska's whereabouts on July 20, 2016.

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Memorandum to the Supplemental Motion for a New Trial on October 15, 2021. The Government does not oppose this scheduling request.

Respectfully submitted,

/s/ Arlo Devlin-Brown
Arlo Devlin-Brown