



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

December 23, 2021

BY ECF

The Honorable Andrew L. Carter, Jr.
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#: _____
DATE FILED: 12/28/21

Re: *United States v. Reginald Fowler, 19 Cr. 254 (ALC)*

Dear Judge Carter:

The Government respectfully submits this letter on behalf of the parties to inform the Court as to the parties' views regarding adjournment of the March 1, 2022 trial date in the above-captioned matter.

Mr. Fowler respectfully requests an adjournment from the current trial date to any date available in the second quarter of 2022 ("Q2") or beyond.

[REDACTED]
[REDACTED] Counsel has met and conferred with the Government to explain many of these details. However, defense counsel has confirmed that Mr. Fowler will be prepared for trial on March 1, 2022 if the Court keeps that date—in particular, if an adjournment would result in witness unavailability or other hardship to the Government or its witnesses.


[REMAINDER OF PAGE LEFT INTENTIONALLY BLANK]

Honorable Andrew L. Carter, Jr.
United States District Judge
December 23, 2021
Page 2

Considering the length of time this case has been pending, the uncertainty of obtaining a new trial date in the coming quarter, and upcoming conflicts for Government's counsel, the Government respectfully requests that the trial proceed on March 1, 2022. If the Court adjourns the trial date to Q2, the Government respectfully requests that the date be set between mid-May and early June 2022 .

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: 

Jessica Greenwood
Samuel P. Rothschild
Sheb Swett
Assistant United States Attorneys
(212) 637-1090/2504/6522

cc: Edward Sapone, Esq. (by ECF)

The Jury Selection and Trial scheduled for March 1, 2022 is adjourned to May 16, 2022 at 9:30 a.m. Time excluded from 2/14/22 to 5/16/22 to allow defense counsel to prepare for trial.

So Ordered.


12/28/21