



MEMO ENDORSED

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

July 7, 2021

BY ECF

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

USDC SDNY
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Re: *United States v. Reginald Fowler*, S3 19 Cr. 254 (ALC)

Dear Judge Carter:

The Government writes to provide a status update in the above-captioned matter. The Government has substantially completed its production of discovery to new defense counsel, except for materials seized from the defendant's businesses during his arrest. These materials had been produced to previous defense counsel and the Government anticipates producing these materials, as well as a small number of new documents, to defense counsel within two weeks. Additionally, the Government has made all known *Brady* disclosures to defense counsel and has provided a summary of key evidence it believes supports the charges contained in the Superseding Indictment.

The parties are not currently engaged in plea negotiations and do not anticipate resuming negotiations. Accordingly, the parties respectfully request that the Court set a trial date. The parties are available in early February 2022 and the Government anticipates that its case-in-chief would last approximately two weeks.

The defendant also requests that the Court set a schedule for pretrial motions, which the Government does not oppose. The parties propose the following schedule:

October 1, 2021 – Deadline for the defendant's pretrial motions
October 22, 2021 – Deadline for the Government's opposition
November 5, 2021 – Deadline for the defendant's reply

The Government respectfully requests, with the defendant's consent, that the Court exclude time from calculation under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), until the trial date. The exclusion of time will allow the defendant to continue reviewing discovery, consider motions, and prepare for trial.

Respectfully submitted,
AUDREY STRAUSS
United States Attorney

By: /s/
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cc: Edward Sapone, Esq. (by ECF)

The application is **GRANTED**.
Jury Selection & Trial set for
2/14/22 at 9:30 a.m. Time
excluded.
So Ordered.


8/4/21