



COHEN & GRESSER LLP

800 Third Avenue  
New York, NY 10022  
+1 212 957 7600 phone  
www.cohengresser.com

Mark S. Cohen  
+1 (212) 957-7600  
mcohen@cohengresser.com

Christian R. Everdell  
+1 (212) 957-7600  
ceverdell@cohengresser.com

April 18, 2023

**VIA ECF**

The Honorable Lewis A. Kaplan  
United States District Court  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Samuel Bankman-Fried*, S5 22 Cr. 673 (LAK)**

Dear Judge Kaplan:

On behalf of our client, Samuel Bankman-Fried, we respectfully submit this letter to request an extension until Friday, April 21, 2023 to implement certain specific bail conditions set forth in the Court's March 28, 2023 order (the "Order") (ECF No. 118). The defense previously requested one-week extensions on April 4, 2023 and April 11, 2023, which the Court granted. (ECF No. 122, 126). The Government consents to this request.

As set forth in our letter dated April 11, 2023 (ECF No. 126), the defense has been able to implement all of the bail conditions set forth in the Order, with the exception of the conditions related to the cellphones used by Mr. Bankman-Fried's parents. As we explained in the letter, we learned recently that the monitoring software installed on the new cellphones we purchased for Mr. Bankman-Fried's parents cannot, in fact, automatically photograph the device's user every five minutes as required by the Order. Since then, the defense has been exploring alternative solutions to secure the parents' cellphones in a manner consistent with the requirements of the Order. We are optimistic that we have found a solution but need until the end of this week to conduct further tests on the monitoring software to confirm its capabilities.

Accordingly, we respectfully request the Court to grant an extension until Friday, April 21, 2023 to implement the bail conditions related to the parents' cellphones. In the meantime, we respectfully request that Mr. Bankman-Fried's parents be permitted to use their existing cellphones.

The Honorable Lewis A. Kaplan  
April 18, 2023  
Page 2

Respectfully submitted,

/s/ Christian R. Everdell  
Mark S. Cohen  
Christian R. Everdell  
**COHEN & GRESSER LLP**  
800 Third Avenue, 21st Floor  
New York, New York 10022  
(212) 957-7600  
mcohen@cohengresser.com  
ceverdell@cohengresser.com

cc: All counsel of record (via ECF)