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February 17, 2023

VIA ECF

The Honorable Jennifer H. Rearden
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Charles McGonigal and Sergey Shestakov, 23 Cr. 16 (JHR)

Dear Judge Rearden:

I represent Sergey Shestakov in the above-referenced matter and write to request a brief extension of time to respond to the Government's application for a protective order from Tuesday, February 21, 2023 to Friday, February 24, 2023. *See* ECF Nos. 22, 23. I request this extension because I am out of town and do not return to the office until Tuesday, February 21. The Government consents to this request. This is the first request for an extension of time regarding the protective order. The parties are scheduled to appear next before the Court on March 8, 2023. This extension would not affect any other deadlines or scheduled dates.

As a status update, Mr. Shestakov has agreed to be bound by the Government's proposed protective order while issue of that protective order remains pending before the Court. Thus, the Government has begun providing discovery to us.

Respectfully submitted,

/s/ Rita M. Glavin
Rita M. Glavin

Counsel for Defendant Sergey Shestakov