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July 5, 2024

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By ECF

Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

**Re: United States v. Roman Storm
23 Cr. 430 (KPF)**

Dear Judge Failla:

We write on behalf of our client Roman Storm to respectfully request that the Court grant a continuance of the trial date from September 23, 2024 to late January or February 2025. This is Mr. Storm's first request for an adjournment of his trial date. The government opposes a continuance.

The defense has been preparing diligently for trial; however, to ensure Mr. Storm has a fair trial, an adjournment to early 2025 is necessary. Additional time is needed because this case involves complex and novel legal and factual issues, a number of which are raised in the pending motions to dismiss, suppress, and compel that are set for oral argument on July 12, 2024. The government has also produced voluminous discovery in this case on a rolling basis (millions of pages of documents, many of which are in Russian and require translation), which the defense is still analyzing and conferring with Mr. Storm about. As trial preparation has advanced, the complexity of this case has required re-examination of discovery productions. Further, additional discovery productions are expected. Defense counsel also needs additional time to work with experts it expects to call at trial.

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Defense counsel respectfully requests a trial date sometime in late January or February 2025 or later that works for the government and the Court. We will be prepared to address this request further at the upcoming hearing.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'B. E. Klein'.

Brian E. Klein
Keri Curtis Axel (Admitted Pro Hac Vice)
Kevin M. Casey
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Attorneys for Roman Storm