

AGNIFILO INTRATER

November 21, 2024

BY ECF

Hon. Arun Subramanian
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Combs*, 24-cr-542 (AS)

Dear Judge Subramanian:

In support of Mr. Combs' renewed bail application (Dkt. 60) and its reply (Dkt. 80), we have submitted to the Court and the government a 20 minute video under seal, pursuant to the Protective Order in this case (Dkt. 81, Geragos Decl., Ex. D.)

This video was prepared by Conor McCourt. (See Geragos Decl. ¶¶45-46.) Mr. McCourt was previously a foot patrol officer with the New York City Police Department in January of 1993, was promoted to sergeant in November of 1997, and after September 11th, he was assigned to the Technical Assistance Response Unit ("TERU"). TERU was a unit that supported detectives and investigators in the field for high level crimes. Within TERU, he helped develop the forensic video subgroup at TERU, which was focused on recovering video from crime scenes where there were homicides, kidnappings, or police-involved shootings. While at TERU, Mr. McCourt performed thousands of forensic video analyses, and would process that video for detectives or the District Attorney's Office. Mr. McCourt completed his career with the Department in 2009. After retirement from the Department, he started McCourt Video Analysis, where he provides analysis of video for legal cases. In that capacity, he also provides services for several District Attorney's Offices and public defense attorney offices.

He is available to testify at Friday's hearing if the Court would like to hear testimony as to Ex. D and its underlying exhibits. We would need sufficient advance notice for him to bring in his electronic equipment to connect to a court-provided screen in the courtroom to allow for the testimony. We anticipate his direct testimony, if the Court wished to hear it, would be less than 40 minutes long.

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Thank you for your consideration.

Respectfully submitted,



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cc: All counsel (by ECF)