

**quinn emanuel trial lawyers | new york**

295 5th Avenue, New York, New York 10016-7103 | TEL (212) 849-7000 FAX (212) 849-7100

WRITER'S DIRECT DIAL NO.  
**(212) 849-7364**

WRITER'S EMAIL ADDRESS  
**alexspiro@quinnemanuel.com**

March 31, 2025

**VIA ECF**

Hon. Dale E. Ho  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 905  
New York, New York 10007

Re: United States v. Adams, 24-Cr-556-DEH

Dear Judge Ho:

We respectfully write to alert the Court that Mayor Adams's petitions for his candidacy for mayor are due Thursday, April 3, 2025. We urge the Court consistent with its own comments to promptly reach a decision in this matter.

A brief review of the timeline of this case underscores the need for prompt resolution. The Government began its own campaign of prejudicial leaks to taint Mayor Adams on November 2, 2023. They have continued, unabated, for over a year. On September 26, 2024, the indictment was unsealed. *See* ECF No. 3. On September 30, 2024 and October 1, 2024, Mayor Adams filed a motion to dismiss the bribery count as legally deficient and a motion for a hearing and sanctions in connection with the Government's leaks. ECF Nos. 13, 18. The Court denied both motions. ECF Nos. 49, 68.

On November 1, 2024, the Court set a trial date of April 21, 2025, noting that it is "taking very seriously the public's interest in a quick trial," and recognizing Mayor Adams's heightened interest "specifically in light of the election calendar." Nov. 1 Hrg. Tr. at 60.

On February 14, 2025, the Government moved to dismiss the indictment, and on February 18, 2025, Mayor Adams filed his consent to dismissal. ECF Nos. 122, 131. The Court held a hearing on the Government's motion on February 19, 2025, during which it reiterated that "it's not in anyone's interest here for this to drag on...not in the government's interest, not in Mayor Adams'[s], as the defendant, and it's not in the public's interest." Feb. 19 Hrg. Tr. at 55.

**quinn emanuel urquhart & sullivan, llp**

ABU DHABI | ATLANTA | AUSTIN | BEIJING | BERLIN | BOSTON | BRUSSELS | CHICAGO | DALLAS | DOHA | HAMBURG | HONG KONG | HOUSTON | LONDON | LOS ANGELES | MANNHEIM | MIAMI | MUNICH | NEUILLY-LA DEFENSE | NEW YORK | PARIS | PERTH | RIYADH | SALT LAKE CITY | SAN FRANCISCO | SEATTLE | SHANGHAI | SILICON VALLEY | SINGAPORE | STUTTGART | SYDNEY | TOKYO | WASHINGTON, DC | WILMINGTON | ZURICH

On February 21, 2025, the Court appointed Paul Clement as *amicus curiae* to assist in the Court's decision-making. ECF No. 136. On February 26, 2025, Mayor Adams filed a motion to dismiss with prejudice based on additional, incontrovertible government leaks. ECF No. 140. On March 7, 2025, Mr. Clement submitted his *amicus curiae* brief, concluding that the Court should dismiss the indictment with prejudice. ECF No. 159. Upon careful and independent consideration, Mr. Clement found "ample reason to dismiss this prosecution with prejudice," including "the distinct appearance problems inherent in a public official serving his constituents with the ever-looming prospect of re-indictment by the executive on charges already laid bare in a public indictment." *Id.* at 25.

Now, with the petition-filing deadline just days away, we respectfully urge the Court to issue its decision as soon as practicable.

Respectfully submitted,

*/s/ Alex Spiro*

Alex Spiro

cc: all counsel of record via ECF