

Katten

575 Madison Avenue
New York, NY 10022-2585
+1.212.940.8800 tel
katten.com

MICHAEL M. ROSENSAFT
michael.rosensaft@katten.com
+1.212.940.6631 direct
+1.212.940.8776 fax

April 28, 2020

VIA ECF

The Honorable Gary R. Brown
United States District Judge
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: *United States v. Michael Cohn, 19 Cr. 97 (GRB)*

Dear Judge Brown:

Defense counsel writes on behalf of all parties to jointly request that the trial set before Your Honor for June 15th in the above-referenced case be adjourned such that a jury would be selected the week of August 31st and the trial would begin on or about September 8th. We understand the Court may be available for those dates, while understanding there is some uncertainty due to the current pandemic.

We make this request in light of the current COVID-19 crisis to protect the health and safety of the parties, potential jurors, and this Court. In addition, Mr. Cohn resides in Connecticut and suffers from certain health conditions that put him at a greater risk for complications from the virus. Finally, the continuance is also necessary so that Defendant can adequately prepare for trial, which has been made more difficult by restrictions put in place due to the virus. Defendant would waive his speedy trial rights until such date and submits that such a waiver would serve the ends of justice.

If the Court is inclined to grant this request, the parties would also ask that the current briefing schedule for motions in limine be amended such that all moving papers would be due on July 17th, responses in opposition would be due on July 31st, and replies submitted by August 7th with oral arguments scheduled thereafter at the Court's convenience.

Sincerely,

/s/ Michael M. Rosensaft

Michael M. Rosensaft