



U.S. Department of Justice

United States Attorney
Southern District of New York

Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

February 2, 2026

BY ECF & EMAIL

The Honorable Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Maduro Moros and Flores de Maduro*, S4 11 Cr. 205 (AKH)

Dear Judge Hellerstein:

The Government writes, with consent of the defense, to respectfully request (1) a brief adjournment of the next status conference, currently scheduled for March 17, 2026, to March 26, 2026 at 11:00 a.m., a date and time we understand to be convenient for the Court; and (2) that time between March 17 and March 26, 2026 be excluded as to both defendants under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A). The adjournment is necessary to avoid scheduling and logistical issues in connection with the current March 17 date. The Government respectfully submits that the ends of justice served by granting the requested exclusion of time under the Speedy Trial Act outweigh the interests of the public and the defendants in a speedy trial so that the Government can produce discovery, the defense can review discovery, and the defense can consider what pretrial motions it expects to make. Counsel for both defendants have informed the Government that they consent to the foregoing requests.

Respectfully submitted,

JAY CLAYTON
United States Attorney

By: _____/s/
Kaylan E. Lasky
Henry L. Ross
Kevin T. Sullivan
Kyle A. Wirshba
Assistant United States Attorneys
(212) 637-2493

cc: Counsel of Record (by ECF & Email)

The Conf. is adjourned and
time is excluded until
March 26, 2026 at
11:00 a.m. in the interest
of justice.
Alvin K. Hellerstein
2/2/2026