



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*

September 18, 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 respectfully writes to request that the Court enter the revised proposed protective order attached hereto as Exhibit A. The revised proposed protective order includes a new paragraph nine reflecting the defendants' consent to cross-production of certain electronically stored information. Counsel for both defendants have informed the Government that they consent to the addition of this paragraph to the protective order.

Respectfully submitted,

JAMES M. MCDONALD
United States Attorney

By: _____/s/
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cc: Counsel of Record (by ECF & Email)