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June 17, 2022

VIA ECF

Hon. Nicholas G. Garufis
or Judge Assigned to this Matter
United States District Court Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Keith Raniere, et al., 18 Cr. 204 (NGG)

Dear Judge Garaufis:

I respectfully request a 60-day extension to the Rule 33 filing deadline of June 21, 2022 (accounting for Sunday and a federal holiday on Monday) on behalf of my client, Mr. Keith Raniere.

Mr. Raniere has advised me that there are legal issues he would like to pursue in a supplemental *pro se* brief pursuant to Rule 33 of the Federal Rules of Evidence as now that the extensive tampering has been shown, there are additional anomalies and violations that need to be examined in a different light. He respectfully requests the Court grant him this additional time as his incarceration severely limits his access to legal resources and hence his ability to research and draft as well as interview potential witnesses. An extension of 60 days would be sufficient for Mr. Raniere to properly research and draft his remaining issues of concern.

I inquired with the government via email and Ms. Hajjar noted that the government would object to this request.

In the interest of justice, I would kindly ask this Court to extend the deadline for filing until August 19, 2020. Because the case is post-trial with all Rule 33 motions in abeyance pending a decision on the appeal from the Second Circuit, there will be no prejudice to the government.

Very truly yours,
Tully & Weiss Attorneys at Law

/s/Joseph M. Tully
Joseph M. Tully

cc: All Counsel (via ECF)

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