

**Federal Defenders
OF NEW YORK, INC.**

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November 30, 2015

Via Ecf

Honorable Edgardo Ramos
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. El Gammal
15 Cr. 588 (ER)

Hon. Judge Ramos,

I write to request a 10-day adjournment of the December 1, 2015, date. Discovery was produced on a rolling basis and we need time to review it. Additionally, we plan to file a motion pursuant to 18 U.S.C. section 3142 for pretrial release. The government needs a week to respond.

To that end, we request that the time between December 1, 2015, and the next court date decided by the Court, be excluded under the Speedy Trial Act, pursuant to Title 18, United States Code, section 3161(h)(7)(A). Excluding time will best serve the ends of justice and outweigh the best interests of the public and the defendant in a speedy trial, as it will allow the parties counsel to continue discussions regarding a possible disposition in the matter.

Thank you for considering this request.

Respectfully submitted,

Sabrina P. Shroff
Assistant Federal Defender

cc: AUSAs Surratt & Quigley (via email)