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September 16, 2021

**BY ECF**

Honorable Brian M. Cogan  
United States District Judge for the  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York, 11201

Re: United States v. Colinford Mattis, 20 Cr. 00403 (BMC)

Your Honor:

With consent of the government, I write to request a two-week adjournment of the motion deadline of September 17, 2021. Granting the requested extension of time (to October 1, 2021), will allow the parties to possibly continue and hopefully complete plea discussions. The government has requested that plea negotiations conclude prior to the filing of pre-trial motions, and the parties hope to do just that.

As motions remain pending, time under the Speedy Trial Act is properly excluded pursuant to Title 18, United States Code, section 3161(h)(8)(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, because it will allow the government and defense counsel to continue discussions regarding a possible disposition in the matter.

We thank the Court for its time and consideration of this request.

Respectfully submitted,

/s/Sabrina P. Shroff  
Counsel to Colin Mattis

cc: all counsel