



United States Attorney
Southern District of New York

[REDACTED]

July 11, 2019

VIA ECF

The Honorable Richard M. Berman
United States District Court
Southern District of New York
United States Courthouse
[REDACTED]
[REDACTED]

Re: *United States v. Jeffrey Epstein, 19 Cr. 490 (RMB)*

Dear Judge Berman:

The Government respectfully submits this letter in response to the defendant's motion for leave to file a supplemental financial disclosure under seal (the "Sealing Motion") in connection with his motion for pretrial release (the "Bail Motion").

The Government takes no position on the defendant's application, but notes that as of this filing the Government still has not yet received any financial disclosure or information from the defense in connection with the defendant's application for bail. It is now more than three days following the defendant's initial presentment, more than seven hours *after* the defendant's deadline to file his Motion, and less than 24 hours before the Government's deadline to reply. There is no reason that the defendant need have waited until this evening to submit his Sealing Motion, and the Government cannot meaningfully respond to a Bail Motion that contains no material financial information, either under seal or otherwise.

Accordingly, the Government respectfully requests that its deadline to respond to the defendant's Bail Motion be extended to at least 24 hours following the defendant's disclosure of any financial information upon which he intends to rely in connection with the Motion. Should

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that require adjourning the bail hearing, the Government respectfully requests that the hearing be moved to a date and time convenient for the Court and sufficient to permit the Court to review the Government's reply.

Very truly yours,

GEOFFREY S. BERMAN
United States Attorney

By: 

Assistant United States Attorney
Southern District of New York

Cc: Martin Weinberg, Esq., and Reid Weingarten, Esq., *counsel for defendant*