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February 23, 2023

**Via CM/ECF**

The Honorable Pamela K. Chen  
United States District Court for the Eastern District of New York  
255 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *United States v. Carlos Martinez, No. 15-cr-252 (PKC)***

Dear Judge Chen,

We write on behalf of Carlos Martinez seeking a ruling from the Court as to the scope of cross-examination with respect to the anticipated testimony of Special Agent Matthew Callahan. The government has elected to make SA Callahan available to Mr. Martinez and Mr. Lopez to complete the impeachment of Mr. Burzaco's testimony. While the government may elicit testimony regarding the process agents use to write FBI 302s and MOIs, it may not seek to elicit any additional statements contained in the interview reports. Given that Mr. Martinez anticipates calling SA Callahan to testify February 27 or 28, Mr. Martinez seeks a ruling from the Court on this issue.

Respectfully,

A handwritten signature in black ink, appearing to read 'S. A. Josephs', with a long, sweeping flourish extending to the right.

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