## Case 1:15-cr-00252-RJD-RML Document 80 Filed 11/13/15 Page 1 of 2 PageID #: 524 $Ballard\ Spahr$

919 Third Avenue, 37th Floor New York, NY 10022-4915 TEL 212.223.0200 FAX 212.223.1942 www.ballardspahr.com Charles A. Stillman Tel: 212.223.0200 ext. 8015 Fax: 212.223.1942 stillmanc@ballardspahr.com

November 13, 2015

By Electronic Filing

Honorable Raymond Dearie United States District Court Judge United States Courthouse 225 Cadman Plaza East Brooklyn, New York 11201

Re: United States v. José Maria Marin, 15 Cr. 252 (RJD) (RML)

Dear Judge Dearie:

I write to provide an update with respect to Defendant José Maria Marin's compliance with the Court's Order Setting Conditions of Release and Bond (the "Order") and to request a further, brief extension of the time to fulfill the requirements of Mr. Marin's bail package until November 23, 2015.

Mr. Marin, at his expense, is subject to round-the-clock electronic monitoring as well as by a professional security service. He has also filed a mortgage in favor of the United States government with the Clerk of the County of New York against real property that he owns in Manhattan. Additionally, Mr. Marin's wife and son, along with three others, have executed as sureties on an appearance bond. A final surety is due in Court on November 19 to execute on the appearance bond.

To date, we continue to work to fulfill two requirements listed on Attachment B to the Court's Order: a corporate surety bond, and a sum of cash to be provided to the Clerk of the Court. We have kept AUSA Samuel Nitze apprised of our progress regarding our efforts and he has consented to this request to extend our time to comply with the Court's Order until November 23.

Thank you for your consideration of this matter.

A. STIL-- (Enz)

Respectfully submitted,

Charles A. Stillman

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AUSA Samuel Nitze (by email) Kendall Coffey, Esq. (by email) cc: