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May 24, 2012

VIA ECF

Hon. Kiyo A. Matsumoto.
U. S. District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Russo, et.,al
Dkt. No. 11 CR 00030 (KEM)(RER)

Dear Hon. Matsumoto:

As you are aware, I am attorney under the Criminal Justice Act for Mr. Scopo. I write to respectfully request authorization for the use of paralegals to assist me in reviewing the voluminous discovery material in this case.

As the Court recalls, I was assigned to represent Mr. Scopo in this matter on May 1, 2012, replacing earlier counsel Paul Madden. At the time of my assignment, Mr. Scopo was already indicted and this case had been pending for 18 months. As the Court knows, all counsel for the co-defendants have been representing their clients throughout this period of time, engaged in their required review of the voluminous discovery material in this case which consists of, among other things, approximately 700 recordings.

In our last conference of May 18, 2012, the Court set a trial date of January 13, 2013. During the proceeding, I advised Your Honor that I would endeavor to be ready for trial by this date, but advised the Court that I face an arduous task of reviewing the massive amount of discovery material in a six month period while, at the same time, attending to my obligations for my other clients. I note, again, that approximately a year and a half ago, this matter was deemed a "complex case" and my colleagues have had 18 months to prepare for trial.

It is on this basis, that I request authorization for paralegal assistance. I currently employ a paralegal who can devote a portion of her time to reviewing the aforementioned recordings. I am told that, in this District, authorization for a pay rate of \$65.00 an hour for an in house paralegal meets with approval. Additionally, I propose utilizing an additional paralegal who can devote much of her time to reviewing the evidence. I am advised that an approved pay rate for an outside paralegal is \$50.00 per hour.

Finally, if Your Honor approves this application, I will provide the Court with a statement of charges incurred in furtherance of this plan at 60 day intervals.

Thank you for your consideration.

Very truly yours,


KEVIN J. KEATING

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SO ORDERED:

HON. KIYO A. MATSUMOTO