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June 13, 2012

VIA ECF AND FACSIMILE

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 Judge Matsumoto:

As you are aware, I am attorney for Ralph Scopo. I write to respectfully request an emergency modification of Mr. Scopo's bail conditions.

I have just been advised that on Monday, June 11, 2012, Mr. Scopo's wife of 45 years, Marianne Scopo, suddenly became ill and was brought to Brookhaven Memorial Hospital. Apparently, emergency surgery was conducted wherein a large tumor was removed from Mrs. Scopo's intestinal area. She remains in the Intensive Care Unit of Brookhaven Memorial Hospital.

As the Court recalls, Mr. Scopo is currently on home detention with electronic monitoring. To date, he has complied with all conditions of release. With this, I ask that the Court allow Mr. Scopo to leave his residence for the sole purpose of visiting his wife at Brookhaven Memorial Hospital. I ask that this temporary modification of his bail conditions remain in effect through Monday, June 18, 2012, at which time I will update Your Honor on Mrs. Scopo's condition.

Thank you for your consideration.

Very truly yours,


KEVIN J. KEATING

KJK:gd

cc: Elizabeth Geddes, Esq.
Donna Mackey, Pre-Trial Services

SO ORDERED:

HON. KIYO A. MATSUMOTO