## JOSHUA L. DRATEL, P.C.

A PROFESSIONAL CORPORATION

29 BROADWAY Suite 1412 NEW YORK, NEW YORK 10006

TELEPHONE (212) 732-0707 FACSIMILE (212) 571-3792 E-MAIL: JDratel@JoshuaDratel.com

JOSHUA L. DRATEL

LINDSAY A. LEWIS
WHITNEY G. SCHLIMBACH

STEVEN WRIGHT
Office Manager

September 2, 2015

## BY ECF

The Honorable Katherine B. Forrest United States District Judge Southern District of New York United States Courthouse 500 Pearl Street New York, New York 10007

Re:

United States v. Ross Ulbricht, 14 Cr. 68 (KBF) USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:\_\_\_
DATE FILED: SEP 0 4 2015

Dear Judge Forrest:

This letter is submitted on behalf of Ross Ulbricht, Claimant in the above-entitled civil forfeiture action, whom I represent, and relates to the telephonic conference scheduled for September 9, 2015, at 8:30 a.m. For the reasons set forth below, it is respectfully requested that the conference be adjourned until the following week. I have spoken with Assistant United States Attorney Christine I. Magdo, and she has informed me that the government consents to this request. In addition, it is respectfully requested that Mr. Ulbricht's time to file an answer be extended until September 21, 2015. The government consents to that application as well.

The adjournment of the telephonic conference is requested because I will be in San Diego, California, that day to prepare a Brief on Appeal in the United States Court of Appeals for the Ninth Circuit in *United States v. Moalin*, Dkt. No. 13-50572. I will be meeting with appellate counsel for the three co-defendants-appellants for purposes of combining the several points on appeal into a single joint Brief. Due to the Jewish Holidays the following week, it is imperative that the meeting regarding the Brief occur next week in order that the Brief can be assembled in time for the September 29, 2015, due date.

AUSA Magdo has informed me of her availability the following week, and our mutually available times are:

Case 1:13-cv-06919-KBF Document 30 Filed 09/04/15 Page 2 of 2

Case 1:13-cv-06919-KBF Document 29 Filed 09/02/15 Page 2 of 2

LAW OFFICES OF JOSHUA L. DRATEL, P.C. Hon. Katherine B. Forrest United States District Judge Southern District of New York September 2, 2015 Page 2 of 2

Wednesday afternoon, September 16, 2015 (after 2:15 p.m.)

Thursday morning, September 17, 2015 (before noon)

Friday September 18, 2015 (before 3 p.m.)

Accordingly, it is respectfully requested that the telephonic conference scheduled for Wednesday, September 9, 2015, at 8:30 a.m. be adjourned until the following week, and that Mr. Ulbricht's time to file an answer be extended until Monday, September 21, 2015.

Respectfully submitted,

Joshua L. Dratel

JLD/

Christine I. Magdo cc:

Assistant United States Attorney