



U.S. Department of Justice

United States Attorney  
Southern District of New York

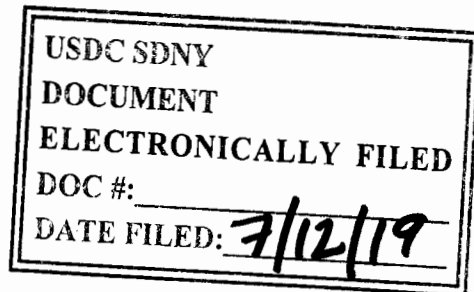
The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

**MEMO ENDORSED**

July 11, 2019

VIA ECF

The Honorable Richard M. Berman  
United States District Court  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, New York 10007



**Re: United States v. Jeffrey Epstein, 19 Cr. 490 (RMB)**

Dear Judge Berman:

The Government respectfully submits this letter in response to the defendant's motion for leave to file a supplemental financial disclosure under seal (the "Sealing Motion") in connection with his motion for pretrial release (the "Bail Motion").

The Government takes no position on the defendant's application, but notes that as of this filing the Government still has not yet received any financial disclosure or information from the defense in connection with the defendant's application for bail. It is now more than three days following the defendant's initial presentment, more than seven hours *after* the defendant's deadline to file his Motion, and less than 24 hours before the Government's deadline to reply. There is no reason that the defendant need have waited until this evening to submit his Sealing Motion, and the Government cannot meaningfully respond to a Bail Motion that contains no material financial information, either under seal or otherwise.

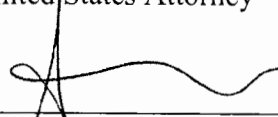
Accordingly, the Government respectfully requests that its deadline to respond to the defendant's Bail Motion be extended to at least 24 hours following the defendant's disclosure of any financial information upon which he intends to rely in connection with the Motion. Should

Honorable Richard M. Berman  
United States District Judge  
July 11, 2019  
Page 2

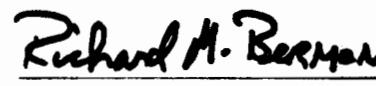
that require adjourning the bail hearing, the Government respectfully requests that the hearing be moved to a date and time convenient for the Court and sufficient to permit the Court to review the Government's reply.

Very truly yours,

GEOFFREY S. BERMAN  
United States Attorney

By:   
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Southern District of New York  
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Cc: Martin Weinberg, Esq., and Reid Weingarten, Esq., *counsel for defendant*

<u>Application for extension of</u> <u>time denied. (Hard to imagine</u> <u>it would take the Govt extra</u> <u>time to review submission.)</u>	
SO ORDERED:	
Date: <u>7/12/19</u>	
Richard M. Berman, U.S.D.J.	