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VIA CM/ECF

December 8, 2017

The Honorable Marvin J. Garbis
United States District Court
for the District of Maryland
101 West Lombard Street
Baltimore, Maryland 21201

Re: United States v. Harold T. Martin, III, MJG-17-069

Dear Judge Garbis:

We write to request an extension of the deadline for filing the defense's *ex parte* submission under CIPA Section 4 from December 15, 2017, to January 26, 2018. On November 28, 2017, we had the opportunity to conduct an evidence review at the Baltimore FBI Field Office's Sensitive Compartmented Information Facility for the first time of some of the items allegedly seized from Mr. Martin's car and residence. In light of the volume of material made available for our review, we expect to return to the FBI multiple more times to review the remainder of the items. Accordingly, we request additional time to review the remaining items and determine the effect of this discovery production on our requests under Section 4. We have conferred with AUSA Harvey Eisenberg, who advised us that the government consents to our request for a 6-week extension of the defense's CIPA Section 4 filing deadline. We thank the Court for its attention to this matter.

Respectfully,

/s/

James Wyda
Deborah L. Boardman
Shari Silver Derrow