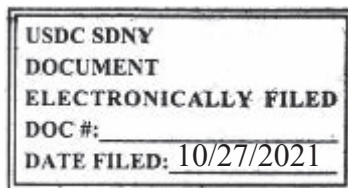




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October 25, 2021

VIA ELECTRONIC FILING

Honorable Alison J. Nathan
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: US v. Greenberg 21 Cr. 92 (AJN)

Dear Judge Nathan:

Counsel for Julia Greenberg respectfully submits this letter seeking to modify the conditions of our client's ability to travel within the contiguous United States pending the outcome of the case. The trial for this matter is scheduled to commence in or about June 2022.

Ms. Greenberg is requesting to travel between December 23 and 25, 2021 to the home of her sister-in-law, Julia Abramovich, at 39 Lynbrook Road, Southboro, Massachusetts 01772. Ms. Greenberg is also requesting to leave New York on December 26th, 2021 and returning January 2nd, 2022 traveling to and from the State of Washington. Ms. Greenberg will fly with her family to Portland, Oregon, and she will then drive to the home of a family friend, Yury Strachuk, where she will stay at 8102 NE 192nd Way, Battle Ground, Washington, 98604.

Counsel also requests to modify Ms. Greenberg's pretrial conditions to permit travel to the Northern and Western Districts of New York, and the District of Vermont for the purpose of outdoor activity and skiing with her partner and children during the winter months.

It is my understanding that Pretrial Services, through Officer Dominique Jackson, has no objection to this request. Additionally, the Government, through Assistant US Attorney Jonathan Rebold, will defer to the recommendation of Pretrial Services for the request to travel to Boston and Washington, however he has not stated his opinion to the addition of the District of Vermont, and the Northern and Western District of New York to Ms. Greenberg's travel restrictions.

Ms. Greenberg has been in complete compliance with the terms of her pretrial release.

Thank you for your time and attention in this matter.



The Court GRANTS Ms. Greenberg's unopposed requests to modify the conditions of her pretrial release.

SO ORDERED.

A handwritten signature in black ink, appearing to read 'A. J. Nieto', is written over the text 'SO ORDERED.'.

10/26/2021

Respectfully Submitted,

/s/ Charles Kaser

Charles Kaser, Esq.
Attorney for the Defendant

CC: All Parties (via ECF)