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(HellersteinNYSDChambers@nysd.uscourts.gov)

September 16, 2026

Hon. Alvin K. Hellerstein
United States Courthouse
500 Pearl Street, Room 1050
New York, New York 10007

Re: United States v. Nicolás Maduro Moros, et al. 11-CR-205 S4 (AKH)

Dear Judge Hellerstein,

In the September 9, 2026 filing, ECF 327 at pg. 7, counsel for Cilia Adela Flores de Maduro advised that “[t]he parties have agreed to submit to the Court a letter request concerning a proposed briefing schedule following Ms. Flores de Maduro’s submission.” The government has been able to review the submission, and both parties agree to jointly propose the following schedule for responsive pleadings and a hearing:

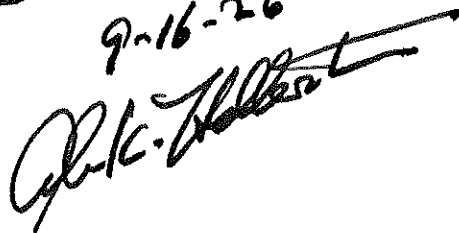
Deadline	Date
Government’s Response	September 23, 2026
Ms. Flores de Maduro’s Reply	September 30, 2026
Bail Application Hearing	Week of October 5, 2026

The parties await guidance from the Court as to the acceptability of the above schedule. Please let the parties know if the Court wishes any additional information.

Respectfully,



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Hearing is set for 10/8/26 at 10:30 a.m.
So ordered
9-16-26


Counsel for Cilia Adela Flores de Maduro

CC: Counsel of Record (via email)