



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

NJM:TH  
F. #2017R01840

*271 Cadman Plaza East  
Brooklyn, New York 11201*

May 19, 2023

By ECF

The Honorable Nicholas G. Garaufis  
United States District Judge  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Keith Ranieri  
Criminal Docket No. 18-204 (S-2) (NGG)

Dear Judge Garaufis:

The government respectfully writes to request leave to file a consolidated response to the defendant Keith Ranieri's third motion for a new trial, filed on May 3, 2022, and his motion to compel post-judgment discovery material, filed on April 14, 2023. ECF Docket Nos. 1168-1170, 1191-92. Both motions are predicated on same series of entirely meritless claims about the government's conduct. Since the motions raise similar issues, consolidation of the government's response will avoid unnecessary duplication.

The government therefore respectfully requests that it be permitted to file an omnibus memorandum in opposition as to both motions by June 23, 2023, or by any date which the Court directs.

Respectfully submitted,

BREON PEACE  
United States Attorney

By: /s/  
Tanya Hajjar  
Assistant U.S. Attorney  
(718) 254-7000

cc: Counsel of Record (by ECF and email)