



**BALAREZO LAW**  
CRIMINAL DEFENSE

September 19, 2018

The Honorable Brian M. Cogan  
United States District Judge  
for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *United States v. Joaquín Archivaldo Guzmán Loera*  
Case No. 09-CR-0466(S-4)(BMC)

Dear Judge Cogan:

Mr. Guzmán respectfully writes to alert the Court of possible additional agenda items for discussion at the status conference scheduled for tomorrow.

The additional possible items are:

- a. a request for unredacted § 3500 material;
- b. a request for final transcripts for 7 specific recordings; and
- c. the government's non-compliance with the Court's Order of September 7, 2018 (Doc. 303).

The parties filed a joint agenda on September 13, 2018 (Doc. 312). However, the first two items remain unresolved and the third arose with the government's filing of today (Doc. 320).

Mr. Guzmán has served the government a letter addressing the three items and requested a response prior to the scheduled hearing. (Doc. 324). In the event there is no satisfactory response from the government, Mr. Guzmán respectfully requests leave to address these issues tomorrow.

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Mr. Guzmán apologizes for any inconvenience to the Court.

Respectfully submitted,

**BALAREZO LAW**

By:



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cc:

Government Counsel  
(via ECF)