

January 19, 2016

SENT UNDER SEAL / CONFIDENTIAL

BY EMAIL

The Honorable Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square, Room 240
New York, NY 10007
CaproniNYSDChambers@nysd.uscourts.gov

Re: *U.S. v. Silver*, 15-cr-00093-VEC (S.D.N.Y.)

Dear Judge Caproni:

We represent an individual who, we are informed, is the subject of a motion currently under seal by Your Honor. We understand that Court has asked the parties to brief the issue of whether the motion should remain under seal now that the trial has concluded.

As our client will be impacted by the Court's decision on this issue, we respectfully request that the Court direct that we be provided with the parties' sealed papers relating to this matter, allow us to submit a letter on the motion, and that the Court receive this letter, and any letter we submit to the Court, under seal.

Thank you for your consideration.

Respectfully submitted,

MANUEL ORTEGA, ESQ.

THE LAW OFFICES OF

MANUEL ORTEGA, ESQ.

CC: Carrie Cohen, Esq. (carrie.cohen@usdoj.gov)
Joel Cohen, Esq. (jcohen@stroock.com)
Andrew Goldstein, Esq. (andrew.goldstein@usdoj.gov)
Robert Kry, Esq. (rkry@mololamken.com)
Howard Master, Esq. (howard.master@usdoj.gov)
Steven Molo, Esq. (smolo@mololamken.com)
Justin Shur, Esq. (jshur@mololamken.com)