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July 17, 2006,

Hon. Dora I. Irizarry.
United States District Court Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: United States v. Isaac Almanzar et al
05 Cr 623 (DLI)**

Dear Judge Irizarry:

I am writing on behalf of all defense counsel in the above-referenced matter to advise the court of the progress of plea negotiations and to request, with the concurrence of the government by Assistant United States Attorney Colleen Kavanagh, that the August 1, 2006 court date be held as a status conference date rather than a date for hearings on outstanding motions.

Over the past weeks defense counsel have had group co-defendant meetings at the MDC, individual meetings with our respective clients, as well as group and individual plea discussions with Ms. Kavanagh. As a result of these continuing efforts by the parties substantial progress has been made towards resolution of the case on a “global” basis.

Accordingly, it is respectfully suggested that the interests of justice and judicial economy will best be served by having August 1, 2006 serve as a status date.

Thank you for your consideration to this request.

Very sincerely,

Richard H. Rosenberg

cc.: AUSA Colleen Kavanagh, Esq.
Sam Gregory, Esq.
Sally Butler, Esq.
Scott Fenstermaker, Esq.
Barry S. Turner, Esq.
John Burke, Esq.