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VIA ECF

March 8, 2021

Honorable Denise L. Cote
United States District Court Judge
United States District Court
Southern District of New York
500 Pearl Street, Suite 1040
New York, New York 10007

*The conference is adjourned
sine die.
Denise Cote
March 8, 2022*

Re: **United States of America et al. ex rel. Miller, v. Citigroup, Inc. et al.,
19 Civ. 10970 (DLC)**

Dear Judge Cote:

Along with our Co-Counsel Mehri & Skalet, we represent the Relator in the above-referenced *qui tam* action. This letter is submitted by all parties to jointly request an adjournment of the Initial Pre-Trial Conference. The Initial Pre-Trial Conference is currently scheduled for March 11, 2022, at 3pm, via conference call. This is the first request for an adjournment of this Conference.

The request is prompted by the respective extensions of time granted to the Government and Citibank to respond to the Relator's motion for an Award of a *Qui Tam* Relator's Share and the potentially dispositive nature of Relator's motion. Including any respective replies from the Plaintiff, the Parties anticipate that the pending motion will be fully briefed in mid-May. Thus, the Parties respectfully request that the conference be adjourned *sine die* and that it be re-

scheduled at the Court's convenience, following Your Honor's decision on the Relator's Motion for an Alternate Remedy.

Please contact the parties with any concerns or questions. We thank the Court for its consideration of this joint request.

Respectfully,

s/ Robert J. Valli, Jr.
Robert J. Valli, Jr.

Cc: Counsel for Citibank
Counsel for the Government
Co-Counsel for Relator.
All via ECF and/or Email