



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

September 16, 2022

VIA ECF

Hon. P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: ***Moscoso v. Joyce, et al., No. 22 Civ. 6272 (PKC)***

Dear Judge Castel:

This Office represents the government in the above-referenced habeas corpus action brought pursuant to 28 U.S.C. § 2241. I write to respectfully request that the initial pretrial conference scheduled for October 17, 2022, be adjourned *sine die*. An initial pretrial conference—which typically includes a discussion of contemplated motions and sets a schedule for the litigation via a case management plan—is not necessary in this matter, given that all briefing on the habeas petition is now complete.

Counsel for the petitioner opposes this request on the ground that, while “the initial conference is ordinarily not needed in the habeas context, . . . we would prefer to leave the date on the calendar in case the petition is still undecided then and Judge Castel has any questions about the case.”

This is the government’s first request for an adjournment of the initial pretrial conference, and I thank the Court for its consideration of this request.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: /s/ Jessica F. Rosenbaum
JESSICA F. ROSENBAUM
Assistant United States Attorney
Telephone: (212) 637-2777
E-mail: jessica.rosenbaum@usdoj.gov

cc: Counsel of record (via ECF)

O October 17
conference
is VACATED
as ORDERED
JWW USDOJ
9-19-23