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June 24, 2021

Via PACER/ECF

The Honorable Nelson S. Román
 United States Courthouse
 300 Quarropas Street, Room 218
 White Plains, New York 10601

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: _____ DATE FILED: <u>6/25/2021</u>

Re: Waterkeeper Alliance, Inc. v. Spirit of Utah Wilderness, Inc. et al.
Civil Action No.: 10-cv-1136

Dear Judge Román:

This law firm represents the plaintiff, Waterkeeper Alliance, Inc. (“Plaintiff”), in the above-captioned suit.

On June 1, 2021, the Court granted the eighth letter motion filed by defendant Jeffrey Salt (“Salt”) to extend the deadline for him to surrender to the U.S. Marshals Service due his repeated, willful violations of this Court’s Orders from May 1, 2021 until August 1, 2021 on the express condition that Salt provide the financial affidavit and responses to Plaintiff’s interrogatories and document requests as required by this Court’s prior orders on or before June 22, 2021. (ECF Doc. 227, emphasis supplied). Salt has not complied with any of the requirements imposed by the Court as a condition of the surrender date extension by completely failing to provide the financial affidavit and responses to Plaintiff’s discovery requests.

Accordingly, Plaintiff respectfully requests that the Court reinstate the previously imposed penalty of imprisonment and require Salt to surrender to the U.S. Marshal by no later than Wednesday, June 30, 2021. Salt cannot be permitted to continue flagrantly disregarding this Court’s Orders without consequence, which he will obviously continue to do unless he is imprisoned.

Thank you for the Court’s attention to this matter.

Respectfully submitted,

WACHTEL MISSRY LLP

Jason L. Libou, Esq.

Mr. Salt is directed to respond to Plaintiff and the Court on or before July 9, 2021.

Dated: 6/25/2021
 White Plains, NY

SO ORDERED:

HON. NELSON S. ROMAN
 UNITED STATES DISTRICT JUDGE

092485-001/00289989-1

MEMO ENDORSED