



U.S. Department of Justice

United States Attorney
Southern District of New York

Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

July 21, 2026

BY ECF & EMAIL

The Honorable Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

The parties' proposed schedule is adopted. Oral argument on the first round of defense pretrial motions shall be held on November 17, 2026 at 10:30 am. The final pretrial conference shall be held on May 25, 2027 at 11:00 am. Trial will begin June 1, 2027.

SO ORDERED.

Re: *United States v. Maduro Moros and Flores de Maduro*, S4 11 Cr. 205 (AKH)

7-22-26

Dear Judge Hellerstein:

The Government respectfully writes to advise the Court that the parties intend to request a trial date and certain pretrial deadlines in this case at the July 22, 2026 status conference.

The parties agree that the defendants' pretrial motions should be bifurcated into two rounds of briefing: (i) a first round of motions filed prior to the Government's completion of discovery, including the defendants' anticipated motion claiming immunity in this case; and (ii) a second round of motions, following the Government's completion of discovery, for any of the defendants' additional pretrial motions. Accordingly, the parties jointly propose the following schedule for discovery, pretrial motions, and trial:

Deadline	Date
Defense pretrial motions (first round)	September 2, 2026
Government completion of substantial production of unclassified discovery ¹	September 22, 2026
Government opposition to defense pretrial motions (first round)	October 2, 2026
Defense replies (first round)	October 16, 2026
Oral argument on defense pretrial motions (first round)	November 2026
Government completion of substantial production of classified discovery	November 15, 2026 ²

¹ The Government has already provided the defendants with the vast majority of Rule 16 discovery in this case and will continue to work expeditiously to satisfy its discovery obligations.

² The Government's ability to satisfy its classified discovery obligations depends, in part, on other components of the United States Government outside the U.S. Department of Justice. If delays prevent the Government from meeting this deadline, the Government will so inform the defense and anticipates a motion to adjust the following motion schedule. The provision of classified discovery may result in litigation under the Classified Information Procedures Act, which could result in the need to adjust the remainder of the schedule.

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Defense pretrial motions (second round)	January 11, 2027³
Government opposition to defense pretrial motions (second round)	February 18, 2027
Defense replies (second round)	March 11, 2027
Government motion under Section 4 of the Classified Information Procedures Act	March 11, 2027
Trial to commence	June 2027

The parties each reserve the right to seek adjournments of the deadlines set forth above. Counsel for both defendants have informed the Government that they consent to the foregoing requests.

Respectfully submitted,

JAY CLAYTON
United States Attorney

By: /s/
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cc: Counsel of Record (by ECF & Email)

³ In the event that the Court has not ruled on any claims of immunity or other jurisdictional issues made in the defendants' first round of pretrial motions by this date, the defense anticipates that it will seek an adjournment of this deadline and a corresponding adjustment of the remaining schedule.