

**AGNIFILO  
INTRATER**

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September 16, 2025

By ECF  
The Honorable Margaret M. Garnett  
U.S. District Judge  
Southern District of New York  
40 Foley Square  
New York, N.Y. 10007

Re: *United States v. Mangione*, 25 Cr. 176 (MMG)

Dear Judge Garnett:

The current schedule in the above-referenced matter for pretrial motions (not related to the constitutionality of the death penalty<sup>1</sup>) is as follows: defense motions due September 26, 2025; government's response due October 31, 2025; and defense's reply due November 14, 2025. The defense respectfully requests the following modest adjustment to these deadlines: defense motions due October 10, 2025; the government's response due November 14, 2025; and the defense's reply due November 21, 2025. The government does not object to this request.

Importantly, this request is made with the shared understanding that the December 5, 2025, pretrial conference remains firmly in place. The parties agree that maintaining that date is a priority, and we do not seek any adjournment of the conference notwithstanding the proposed adjustments to the motion schedule.

Thank you for your consideration.

Respectfully submitted,

  
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Karen Friedman Agnifilo  
Marc Agnifilo  
Jacob Kaplan

cc: Gov't Counsel (via ECF)  
Moskowitz Colson Ginsberg & Schulman (via ECF)

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<sup>1</sup> As per this Court June 16, 2025, Order, the defense will be filing its death penalty motions this Friday, September 19, 2025.