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April 23, 2020

\* ADMITTED IN NY & NJ

Honorable Paul A. Engelmayer United States District Court Judge Southern District of New York 40 Foley Square New York, New York 10007

Re: United States v. Daniel Hernandez

Docket No.: S5 18-CR-0834-004 (PAE)

Request to Expand Home Confinement to Backyard

Dear Judge Engelmayer:

As you know, I represent Daniel Hernandez. As per the letter e-mailed to your Honor's chamber's e-mail earlier today, I am making a motion to expand Mr. Hernandez's home confinement. Given the sensitive nature of my request, I am requesting that the e-mailed letter be filed under seal.

Thank you for your attention herein. Please contact me if you have any questions or need any additional information.

Very Truly Yours,

LAZZARO LAW FIRM, P.C.

BY: /s/

LANCE LAZZARO

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The defendant is permitted to conduct employment-related activities outside the residence but within the confines of the rented property for two (2) hours per week on one (1) specific day that needs advanced approval by the Probation Officer. Given structural interference with the GPS tracking device, the defendant's hours in the basement of the residence will be limited to no more than an 8-hour period per day with a schedule as determined by the Releasee and approved by the Probation Officer. The Clerk of Court is requested to terminate the motion at Dkt. No. 475.

SO ORDERED.

PAUL A. ENGELMAYER United States District Judge