U.S. Department of Justice

United States Attorney
Southern District of New York

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

September 7, 2026

BY ECF

Honorable Laura Taylor Swain
Chief United States District Judge
Southern District of New York
500 Pearl St.
New York, New York 10007

Re: *United States v. Trevon Thomas*, *et al.*, 26 Cr. 233 (LTS)

Dear Chief Judge Swain,

The Government respectfully moves the Court to enter the attached revised proposed protective order, which the parties have reached agreement on after further discussion pursuant to the Court's August 26, 2026 order. (Dkt. 30.) The Government will produce discovery at the beginning of next week.

In light of the foregoing, the parties also agree that the conference scheduled for this Wednesday, September 9, 2026 at 11:00 a.m. can be canceled. The Government and counsel for Jacob Cargill are prepared to proceed with the bail appeal at that time, as scheduled. (Dkt. 31.)

Respectfully submitted,

JAMES M. MCDONALD
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by: /s/
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Cc: Counsel of Record