

**MEMO ENDORSED**

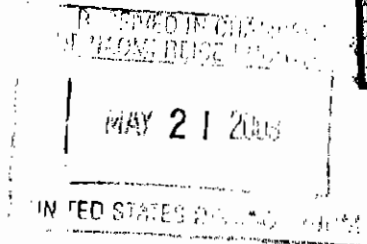
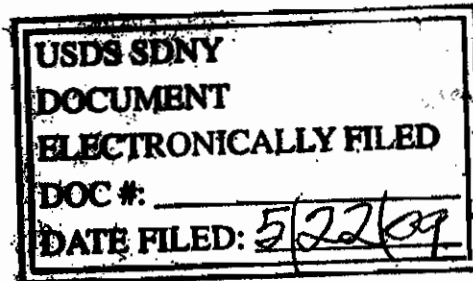
LAW OFFICES OF  
**GERALD B. LEFCOURT, P.C.**  
A PROFESSIONAL CORPORATION  
145 EAST 78<sup>TH</sup> STREET  
NEW YORK, NEW YORK 10075

GERALD B. LEFCOURT  
lefcourt@lefcourtlaw.com

TELEPHONE  
(212) 727-0400  
FACSIMILE  
(212) 955-5192

—  
SHERYL E. REICH  
reich@lefcourtlaw.com  
RENATO C. STABILE  
stabile@lefcourtlaw.com  
FAITH A. FRIEDMAN  
friedman@lefcourtlaw.com

May 20, 2009



VIA FACSIMILE

The Honorable Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Ivy Woolf Turk*  
07 Cr. 1062 (NRB)

**MEMO ENDORSED**

Dear Judge Buchwald:

I write as counsel to Ivy Woolf Turk, defendant in the above matter, respectfully to request that Ms. Woolf Turk's sentencing, scheduled currently for May 27, 2008, be adjourned to September 23, 2009, or September 24, 2009, or a date thereafter convenient to the Court. I also ask that the briefing schedule outlined below be adopted by the Court. The government joins in this application, both as to the adjournment and the agreed upon schedule.

The sentence is set for September 23, 2009 at 4 pm  
So Ordered  
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Duce  
Dumond  
WDS

As the Court is aware, on February 25, 2009, Ms. Woolf Turk entered a plea to one count of conspiracy to commit mail fraud and wire fraud in violation of 18 U.S.C. § 1349. At the time of the plea, the parties advised the Court that there existed a legal dispute regarding the appropriate measure of "loss" for Guidelines' sentencing purposes, and further, that the issue would require briefing. In light of the foregoing, the Court set a sentencing date of May 27, 2009, with the understanding that the date was a control date to trigger preparation of the PreSentence Report (the "Report") and that the parties were to agree on a briefing schedule.

Since the plea proceedings, Ms. Woolf Turk has been interviewed by the Department of Probation; various submissions and presentations were made to the preparer of the Report; and an initial draft of the Report has been distributed both to the government and defense. In addition, as suggested by the Court, the government and the defense have agreed upon a proposed briefing and sentencing schedule, as follows: (1) defense submissions to be submitted

5/21/09

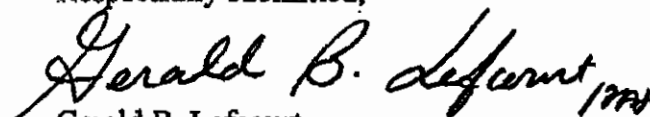
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The Honorable Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
May 20, 2009  
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by July 10, 2009; (2) government response to be submitted by August 17, 2009; (3) any defense reply to be submitted by September 11, 2009; and (4) the sentencing to take place either September 23, 2009 or September 24, 2009, or a date thereafter convenient to the Court.

Accordingly, we ask that Ms. Woolf Turk's sentencing be adjourned consistent with the above outlined briefing and sentencing schedule. Thank you for your consideration.

Respectfully submitted,

  
Gerald B. Lefcourt

cc: Harry Chernoff, Esq.  
*Assistant United States Attorney*