

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA,

v.

ROBERT MENENDEZ

and

SALOMON MELGEN,

Defendants.

Crim. No. 2:15-cr-00155
Hon. William H. Walls

**DEFENDANT ROBERT MENENDEZ'S RESPONSE IN SUPPORT OF
DR. MELGEN'S MOTION FOR EXTENSION OF TIME**

On May 29, 2015, Dr. Melgen moved this Honorable Court for an extension of time to file pretrial motions following a change in counsel. *See* Dkt. 26. Defendant Senator Menendez supports Dr. Melgen's request for an extension of the current motions schedule.

For the past few weeks, Dr. Melgen has been in transition, finding new trial counsel. During this time, Senator Menendez's counsel was unable to talk with, meet with, and especially coordinate with Dr. Melgen's counsel regarding motions that need to be filed. Given the number of potential issues that will require pretrial motions practice, it is essential that counsel for both Defendants can communicate, discuss issues, and avoid duplication of effort where possible. This interaction with Dr. Melgen's new counsel started for the first time at the very end of last week, after the Court granted Dr. Melgen's motion for substitution of counsel. Given that the case is still in discovery and was filed only two months ago, the extension requested by Dr. Melgen will not cause any real prejudice to either the parties or the public.

DATED: June 1, 2015

Respectfully submitted,

/s/ Abbe David Lowell

Abbe David Lowell

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CERTIFICATE OF SERVICE

I hereby certify that, on June 1, 2015, a true and correct copy of the foregoing motion was duly filed with the CM/ECF system for the United States District Court for the District of New Jersey, which will send electronic notifications of the filing to all counsel of record.

/s/ Abbe David Lowell