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VIA ECF

Hon. Margo K. Brodie
Chief Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East, Courtroom 6F
Brooklyn, New York 11201

Re: *United States v. Tim Leissner*, 18-CR-439 (MKB)

Dear Chief Judge Brodie:

This firm has recently been retained as co-counsel for Defendant Tim Leissner (“Mr. Leissner”) in the above-captioned matter. We write to respectfully request a one-month extension of Mr. Leissner’s report date to commence his sentence of imprisonment from February 6, 2026 to March 6, 2026. This application is made having conferred with Assistant United States Attorney Dylan Stern regarding this request, and he has indicated that his office takes no position on this application.

This is Mr. Leissner’s fourth request for an extension of his report date. The Court has granted three prior requests for extension of this deadline. We recognize that prior counsel advised the Court that the January 5, 2026 application for an extension would be Mr. Leissner’s final request. This application, however, is based on new and material information not previously available and bears directly on Mr. Leissner’s safety and his ability to participate in required and imminent immigration proceedings.

Mr. Leissner is a citizen of Germany and is presently subject to an ICE hold which requires his appearance before a DHS immigration judge to determine his lawful permanent resident (green card) immigration status. At the same time, Mr. Leissner’s publicly known status as a long-term



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cooperating defendant in a high-profile matter creates heightened safety concerns. Indeed, as the Government noted in its letter pursuant to Section 5K1.1 of the United States Sentencing Guidelines, Mr. Leissner “will no doubt continue to face harassment and substantial risks his personal safety as a direct result of his cooperation.” These concerns are especially relevant in custody, particularly in higher-security settings, and the parties have been working to secure a placement at a minimum security camp facility that addresses those safety concerns.

Mr. Leissner has presently been designated by the Bureau of Prisons to report to a low security facility. While a minimum security camp placement is likely to mitigate certain safety concerns, counsel has been advised that Bureau of Prisons camp facilities are not equipped to facilitate virtual appearances before immigration judges on the necessary timeline due to institution-specific logistical and technological constraints. As a result, if Mr. Leissner were required to surrender as scheduled to a higher security level facility, which would be far more dangerous for Mr. Leissner, his ability to participate in the required immigration proceeding would be materially impaired. Conversely, placement in a higher-security facility solely to facilitate that immigration hearing would raise serious safety concerns for Mr. Leissner.

As of this morning, counsel has been advised that an expedited immigration hearing can be scheduled within the coming weeks if Mr. Leissner remains at liberty, and that once the immigration proceeding concludes, Mr. Leissner can proceed to surrender at a minimum security camp facility without a risk of custody-related logistics interfering with his required appearance, and without the need for any interim placement that could compromise his safety.

Accordingly, Mr. Leissner respectfully seeks a short, one-month extension of his report date to allow this discrete issue to be resolved. This request is narrowly tailored, based on newly discovered information, and intended to permit the orderly and safe administration of Mr. Leissner’s sentence.

Again, we have conferred with Assistant United States Attorney Dylan Stern regarding this request, and his office takes no position on this application.

Respectfully Submitted,

A handwritten signature in dark blue ink that reads "Edward Paltzik". The signature is written in a cursive style and is positioned above a horizontal line.

Edward Andrew Paltzik

cc: Counsel of record (*via ECF and email*)