



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

ZA:SK/LHE/AK  
F.#2014R00236

*271 Cadman Plaza East  
Brooklyn, New York 11201*

March 29, 2016

By Hand and ECF

The Honorable Margo K. Brodie  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: In re Order Requiring Apple Inc. to  
Assist in the Execution of a Search Warrant  
Docket Nos. 15-MC-1902, 14-CR-387

Dear Judge Brodie:

The government respectfully submits this letter in response to Apple's letter dated March 24, 2016, in which Apple requests additional time to respond to the government's application (filed on March 7, 2016) because it "lack[s] sufficient information to determine the most appropriate way for this matter to proceed." ECF No. 37 at 2. The government has no objection to the relief sought by Apple: The government agrees to extend the current briefing schedule to permit Apple to file its brief on or before April 15, 2016. Id. at 1. The government respectfully requests that the due date for its reply brief be set for April 22, 2016. The government further agrees to update the Court by April 11, 2016, as to whether it intends to modify its application in this matter. Id. at 2.

Respectfully submitted,

ROBERT L. CAPERS  
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cc: All counsel of record (by ECF)