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Raheem J. Brennerman
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Hon. Lewis A. Kaplan
UNITED STATES DISTRICT COURT
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

July 7, 2022

BY CERTIFIED FIRST CLASS MAIL

Regarding: United States v. The Blacksands Pacific Group, Inc., et. al.
Criminal Case No. 17 Cr. 155 (LAK)
REQUEST TO EXPEDITE RELIEF (THE "RELIEF") FROM CRIMES
AND MISCONDUCT AGAINST PETITIONER-DEFENDANT

Dear Judge Kaplan:

The undersigned, Raheem Jefferson Brennerman ("Brennerman") respectfully submits this correspondence to expedite his request for relief (the "Relief") from Crimes and Misconduct perpetuated against him as more succinctly presented at: Brennerman v. U.S., 22 Cv. 996 (LAK), EFC No. 31 and U.S. v. Brennerman, et. ano. 17 Cr. 155 (LAK), EFC No. 241, in light of recent motion filed at the United States Court of Appeals for the Second Circuit at appeal docket no. 22-1282 (copy appended).

The issues which Brennerman presents are clear and unambiguous in highlighting that the Government prosecutors, acting on behalf of this Court, conspired with Linklaters LLP (attorney for alleged victim) through Attorney Paul S. Hessler, to intentionally withhold and hide away the exculpatory and pertinent evidence, missing ICBC files, which Brennerman required for his defense during and after trial.

Brennerman's trial counsel, Thompson Hine LLP through Attorneys Maranda Fritz and Brian Waller, were constitutionally ineffective for failing to seek appropriate subpoena through Federal Rule of Criminal Procedure 17 from this Court to compel ICBC (London)'s New York based counsel, Linklaters LLP for the evidence, missing ICBC files, despite the fact that Government prosecutors already subpoenaed ICBC (London)'s New York based counsel, Linklaters LLP to obtain over 5,000 pages of discovery and the missing evidence, ICBC files, and conspiracy were quite obvious given that the only non-responsive evidence were those ICBC files that exonerates Brennerman and demonstrates his innocence.

Brennerman suffered prejudice because he was deprived of the ability to exercise his Constitutional right, to use the missing ICBC files which Government prosecutors, acting on behalf of this Court, conspired with Linklaters LLP to withhold and hide away, in presenting his complete defense to the jury at trial during their deliberation of his innocence or guilt. In summary, Brennerman was deprived of his Constitutional rights promulgated by the U.S. Supreme Court in "Crane v. Kentucky" adopted by the Second Circuit U.S. Court of Appeals in "Scrimo v. Lee".

The issue here, among others, is not whether Brennerman had credible or plausible defense as insinuated by this Court in highlighting the jury instruction, but rather, that he (Brennerman) was deprived of the ability to even exercise his Constitutional rights to present his complete defense to the jury at trial when the decision on guilt or innocence was solely to be determined by the jury not the judge or prosecutors hence why Government prosecutors, acting on behalf of this Court, conspired with Linklaters LLP to intentionally hide away the very evidence which he (Brennerman) required to do so in demonstrating his innocence of the charged crime.

The missing ICBC files which includes the ICBC [underwriting file], [e-mails], [notes] e.t.c., would have highlighted to the jury during trial that agents of ICBC London, recipient of the discovery ordered by this Court, repeatedly advised Brennerman and agents of Blacksands Pacific that they did not want more discovery but rather preferred to negotiate settlement which resulted in the negotiated draft settlement agreement (see 17 Cr. 155 (LAK), EFC No. 12 Ex. 10) thus the missing evidence would have demonstrated to the jury at trial that Brennerman endeavored to comply with the court orders directed at Blacksands Pacific, particularly the second court order in October 2016 which supplanted the initial court order and stipulated for the parties to "either settle or provide discovery" however Brennerman was deprived of the ability to present those evidence, missing ICBC files, to the jury during their deliberation of his innocence or guilt because Government prosecutors, acting on behalf of this Court, had conspired to hide away those evidence, missing ICBC files, from him.

In the Collateral Attack proceedings, Brennerman requested that this Court grant his request to compel for the pertinent and exculpatory evidence, missing ICBC files, from Linklaters LLP's New York office at 1290 Avenue of the Americas, New York, New York, after Linklaters LLP itself had sent written confirmation that the missing ICBC files were in their possession, however that as a law firm, they require either consent from their client or a court order to produce the evidence, missing ICBC files, to Brennerman so that he may prove and demonstrate that his trial counsel were constitutionally ineffective for failing to compel for the production of those missing evidence, ICBC files, prior to trial and further highlight that he suffered prejudice.

Furthermore, Brennerman requested that this Court grant his request for an evidentiary hearing with Attorney Paul S. Hessler testifying under oath as to why he intentionally withheld and hid away the pertinent and exculpatory evidence,

missing ICBC files, however this Court in an endeavor to cover-up the crimes and conspiracy perpetrated against Brennerman on its behalf, ignored Brennerman's requests and denied his Collateral Attack proceeding on the basis of arguments which Brennerman did not put forth in his Collateral Attack petitions including reply motion.

Brennerman respectfully submits this correspondence to expedite his request for relief (the "Relief") from the crimes and misconduct perpetrated against him as more succinctly presented at Brennerman v. U.S., 22 Cv. 996 (LAK), EFC No. 31 and U.S. v. Brennerman et. ano., 17 Cr. 155 (LAK), EFC No. 241, in the interest of justice.

Dated: July 7, 2022

White Deer, Pa. 17887-1000

Respectfully submitted

/s/ Raheem J. Brennerman
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Petitioner-Defendant Pro Se

UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT

RAHEEM J. BRENNERMAN,

Petitioner-Appellant,

-vs-

Docket No. 22-1282

UNITED STATES OF AMERICA,

Appellee-Respondent,

MOTION FOR EXTENSION OF TIME TO FILE
MOTION FOR CERTIFICATE OF APPEALABILITY

RAHEEM JEFFERSON BRENNERMAN, hereby affirms under penalty of perjury:

1. I am the Petitioner-Appellant in this instant appeal.
2. I, Raheem Jefferson Brennerman ("Brennerman") am a Pro Se Petitioner-Appellant in this matter. As such, I am familiar with the facts and circumstances of this action.
3. Brennerman respectfully seeks 90 days extension of time to file his motion for certificate of appealability.
4. On May 22, 2022, Brennerman submitted correspondence to District Court (Judge Lewis A. Kaplan) to seek relief (the "Relief") from the Court, from the CRIMES and Misconduct perpetrated against Petitioner-Appellant by District Court (Judge Lewis A. Kaplan) and the Government prosecutors, acting on behalf of the Court (Judge Lewis A. Kaplan), as more succinctly presented in the submissions at Brennerman v. United States, 22 Cv. 996 (LAK), EFC No. 31 and United States v. The Blacksands Pacific Group, Inc., 17 Cr. 155 (LAK), EFC No. 241. Copy correspondence is also appended to this motion.
5. Brennerman requires and awaits response from District Court (Judge Lewis A. Kaplan) prior to submitting his arguments for certificate of appealability, so that he may combine any adverse response by District Court with his arguments for certificate of appealability in this instant matter. This is a significant and egregious act where Government prosecutors, acting on behalf of District Court (Judge Lewis A. Kaplan), intentionally committed CRIMES and misconduct against Petitioner-Appellant by intentionally conspiring with Linklaters LLP (attorney for alleged victim) through Attorney Paul Stephen Hessler, to withhold and hide away exculpatory and pertinent evidence, ICBC files, which demonstrates Brennerman's innocence and exonerates him, so as to falsely imprison him.

In the Collateral Attack proceedings, despite the fact that Linklaters LLP confirmed that the missing evidence, ICBC files, which Brennerman requires to obtain relief by demonstrating his trial counsel's ineffectiveness for failing to obtain appropriate subpoena pursuant to the Federal Rule of Criminal Procedure to compel production of the missing ICBC files from Linklaters LLP at 1290 Avenue of the Americas, New York, NY, USA prior to trial and to further highlight that he (Brennerman) suffered prejudice because he was deprived of the ability to present his complete defense in reliance on his Sixth Amendment right and the U.S. Supreme Court promulgation in *Crane v. Kentucky* adopted by this Court in *Scrimo v. Lee*. Furthermore, Brennerman requires the ICBC files and Mr. Hessler's testimony to expose the crime and conspiracy. District Court (Judge Lewis A. Kaplan) in an endeavor to cover-up the CRIME and misconduct, denied Brennerman's request for the ICBC files and the testimony of Attorney Paul S. Hessler, under oath, as to why he intentionally hide away the ICBC files from Brennerman prior to trial. Judge Kaplan did so in an endeavor to cover-up the conspiracy and crimes.

6. PURSUANT to FRAP and the Court's local rule, and in the interest of justice, Brennerman respectfully submits this motion for 90 days extension of time to file his motion for certificate of appealability, to allow District Court (Judge Lewis A. Kaplan) enough time to answer his request for relief currently pending before the Court, prior to submitting his arguments for certificate of appealability, so that any adverse response from District Court may be included with his arguments for certificate of appealability.

WHEREFORE, the Court should grant this motion for extension of time in the interest of justice.

Dated: July 1, 2022
White Deer, Pa. 17887-1000

Respectfully submitted

/s/ Raheem J. Brennerman
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Petitioner-Appellant Pro Se

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