



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

October 15, 2014

VIA ECF

Hon. Edgardo Ramos
United States District Judge
United States District Court
500 Pearl Street
New York, New York 10007

**Re: *Restis et al. v. American Coalition Against Nuclear Iran, et al.*,
No. 13 Civ. 5032 (ER) (KNF)**

Dear Judge Ramos:

I write on behalf of intervenor the United States of America (the “Government”) regarding the October 7, 2014 letter from the American Civil Liberties Union Foundation, the Brennan Center for Justice, the Center for Constitutional Rights, the Constitution Project, the Electronic Frontier Foundation, and the Sunlight Foundation (the “proposed amici”) seeking leave to file an amicus brief.

The Government does not oppose the proposed amici’s request. If the Court believes that it would be helpful to hear from the proposed amici, the Government respectfully requests that the proposed amicus brief be filed in accord with the current briefing schedule for plaintiffs’ motion regarding disclosure established by the Court (*i.e.*, by October 29, 2014), such that the Government has the proposed amicus brief while preparing its opposition papers (presently due November 12, 2014). *See* docket item 273.¹

In light of the Government’s non-opposition to the proposed amici’s filing, the Government respectfully requests that the October 21 conference be canceled. The Government understands that all counsel might not be available on October 21, and notes that the undersigned is unavailable October 22, 23, or 24. If the Court determines to proceed with the pre-motion conference requested by proposed amici on a date other than October 21, the Government respectfully requests that the conference be rescheduled to the week of October 27.

¹ Alternatively, the Government would not object to a modest adjustment in the schedule to accommodate proposed amici so long as their submission is filed on the same date as Plaintiffs’ motion and the Government has the same period of time to address both sets of arguments in its opposition brief.

Respectfully submitted,

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