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March 3, 2015

Honorable Edgardo Ramos
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

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

Dear Judge Ramos:

Plaintiffs Victor Restis and Enterprises Shipping and Trading S.A. respectfully request a status conference to address any remaining issues in the wake of the Government's assertion of the state secrets doctrine (Dkt. 258). Briefing on that assertion may not be complete pending resolution of Plaintiffs' motion for additional information relevant to the Government's assertion (Dkt. 292). The parties completed their submissions on that issue on December 5, 2014 (Dkts. 307, 308).

As a practical matter, however, the case has not moved much since December 2013, when Defendants declined to produce the bulk of their documents pending the Government's potential assertion of a privilege, and the case has been officially stayed for almost a year now. This lack of case progress benefits the Defendants (who never have to answer for the allegations they made which we claim to be defamatory) and the Government (which is getting the stay it has sought without making necessary showings), but it frustrates Plaintiffs' ability and right to pursue a legitimate interest in clearing their names after Defendants' defamation campaigns.

A status conference may be useful to assist the Court in identifying any other issues for which it would like briefing, a hearing or any other proceedings.

Respectfully,

/s/ Abbe David Lowell

Abbe David Lowell

Honorable Edgardo Ramos

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