

October 17, 2014

BY ECF

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

The pre-motion conference scheduled for October 21, 2014 is canceled. The proposed amici are granted leave to file a brief, not to exceed 25 pages, by October 29, 2014.



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

Dear Judge Ramos:

I write on behalf of Defendants, American Coalition Against Nuclear Iran, Inc. (“UANI”), Ambassador Mark Wallace, David Ibsen, and Nathan Carleton, regarding the October 7, 2014 letter from the proposed *amici*, 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.

Defendants do not oppose the motion for leave to file an *amicus curiae* brief. As previously stated, Defendants express no view concerning the level of public disclosure appropriately made in connection with the state secrets privilege assertion by the United States. *See* Hr’g before Hon. E. Ramos (Oct. 8, 2014) at 34:6-9.

We agree with the Government and Plaintiffs that no hearing is necessary for October 21, 2014. If the Court wishes to hold a hearing, we agree with the Government and Plaintiffs that it should be scheduled for the week of October 27, 2014.

Respectfully submitted,

/s/ Lee S. Wolosky
Lee S. Wolosky

cc: Counsel of Record (by ECF)

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MEMO ENDORSED