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The 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-civ-5032
(S.D.N.Y.)

Dear Judge Ramos:

Unfair. More than a year ago, Defendants in this case made a series of extremely serious and entirely false allegations against Victor Restis and Enterprises Shipping & Trading S.A. Defendants publicly accused them of being “front-men” for Iran who broke the law and violated the sanctions against Iran in a variety of ways. When Defendants refused to rescind their allegations even when presented with the truth, Plaintiffs filed this lawsuit. Although Defendants no longer defend their original false allegations, they subsequently launched a new global defamation campaign based on a new series of defamatory claims. All of these defamatory allegations remain on UANI’s website, on the public docket, and in the media to this day.

Defendants do not have to defend their conduct because they can hide behind the U.S. Government and refuse to produce the bulk of relevant documents. Based in part on their communications with Defendants, the Government has now requested three different stays based on a potential privilege that it may or may not assert in the future over an unspecified set of documents. These stays have occurred without *any* public showing by the Government that a privilege could even theoretically apply. *See* Dkts. 88, 99, 108, 110, 141 (Plaintiffs’ requests for additional disclosure). During each successive stay, which now threatens to last for at least 100 days, the damage to Plaintiffs compounds as Defendants continue their defamation campaign.

Plaintiffs oppose the Government’s request for a stay, particularly without any public showing of the necessity for a stay or the potential applicability of a privilege. We also request a status conference with Your Honor to discuss the Government’s request for a stay and the ongoing harm that it causes Plaintiffs. Due to international travel, we are available next week for a telephonic conference or starting on July 10 for an in-person conference.

Respectfully,

/s/ Abbe David Lowell

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