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ADMITTED IN N.Y. AND N.J.

March 27, 2017

VIA ECF

The Honorable Richard M. Berman
United States District Judge
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007

**Re: United States v. Reza Zarrab, et al.,
S1 15 Cr. 867 (RMB)**

Dear Judge Berman:

This letter is respectfully submitted in response to the Government's letter of March 27, 2017 in which they request a hearing pursuant to *United States v. Curcio*, 680 F.2d 881 (2d Cir. 1982).

In substance, the Government advised the Court that a hearing is now necessary because Mr. Zarrab has retained two attorneys, Rudolph W. Giuliani of Greenberg Traurig LLP and Michael B. Mukasey of Debevoise & Plimpton LLP. As in their prior *Curcio* filings in this case, the Government argues that these two law firms represent banks whom the Government alleges are victims of the Bank Fraud charges in the indictment. The Government further suggests that this Court confronted "nearly identical issue presented by the simultaneous representation by Kirkland & Ellis LLP of Zarrab and several of the victims bank." (Government's letter, at 2).

With all due respect to the Government, the issues are not at all identical. Specifically, unlike the attorneys associated with Kirkland & Ellis, no lawyers from Greenberg Traurig or Debevoise & Plimpton will have any involvement in the trial preparation or trial in this case and neither Mr. Giuliani nor Mr. Mukasey intends to file a notice of appearance before Your Honor. Their roles will not require any appearance in Court and, accordingly, a hearing is not required.

Respectfully submitted,



Benjamin Brafman

cc: All counsel of record (by ECF)