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ADMITTED IN N.Y. AND N.J.

June 6, 2016

VIA ECF & BY HAND

Honorable Richard M. Berman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

**RE: UNITED STATES V. REZA ZARRAB
S1 15 CR. 867 (RMB)**

Dear Judge Berman:

After conferring with Government counsel, I write on behalf of all parties and with the consent of my client **REZA ZARRAB**.

At the Detention Hearing on June 2, 2016, your Honor asked the parties to confer among themselves and by June 7, 2016, advise the Court of several potential trial dates, with the understanding that a formal trial date and Motion schedules would be finalized at the next scheduled status conference on June 16, 2016 at 11am.

After discussion with Government counsel, we jointly and respectfully ask for permission to wait until the next status conference to address the issue of a trial date. By then, defense counsel will have a much better handle on the volume of Discovery that we must review and we will also know how much of the materials require translation. The Government may also then be in a better position to advise the Court and counsel of the projected length of the trial that is contemplated.

All counsel believe that by allowing us the extra time to consider these issues, it will also permit us to suggest a more realistic Motion schedule and trial date. Counsel

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assure the Court that we are not intent on delaying these proceedings and the Defendant, having been advised of his right to a Speedy Trial consents to this request in order to allow his attorneys the time needed to prepare for trial and resolve all reasonable Motions they may deem appropriate.

With respect to the Government's letter of Friday, June 3, 2016, counsel for Mr. Zarbab will file our response under separate cover, no later than Tuesday, June 7, 2016, as ordered by the Court.

Thank you for the courtesy extended to all counsel.

Respectfully,



Benjamin Brafman

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