

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

S4 15-cr-00867 (RMB)

UNITED STATES OF AMERICA,

v.

REZA ZARRAB, et al.

Defendants.

**REDACTED VERSION**

**(UNREDACTED VERSION TO BE  
FILED UNDER SEAL)**

**DEFENDANT MEHMET HAKAN  
ATILLA'S NOTICE OF MOTION  
FOR LEAVE TO TAKE RULE 15  
FOREIGN DEPOSITIONS, OR IN  
THE ALTERNATIVE, LIVE  
VIDEO TESTIMONY DURING  
TRIAL FROM DEFENSE  
WITNESSES IN TURKEY**

**PLEASE TAKE NOTICE** that, upon the annexed Declarations of Cathy A. Fleming, Esq. dated November 7, 2017 and Defendant Mehmet Hakan Atilla signed October 27, 2017 ("Mr. Atilla"), and the accompanying memorandum of law, Mr. Atilla, by and through his counsel, will move this Court, at a date and time to be decided, before the Honorable Richard M. Berman, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, for an order, pursuant to Rule 15 of the Federal Rules of Criminal Procedure, authorizing the taking of depositions via videoconferencing of [REDACTED]  
[REDACTED], all of whom reside in the Republic of Turkey, because their testimony is material to the defense, they are unwilling to travel to the United States to testify at trial, and preservation of their testimony is necessary because of exceptional circumstances and in the interest of justice; and ordering such other and further relief as this Court may deem just and proper.

In the alternative, Defendant Atilla will move for permission to take live video testimony during trial from defense witnesses in Turkey.

Dated: New York, New York  
November 7, 2017

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