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May 26, 2016

VIA ECF

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)

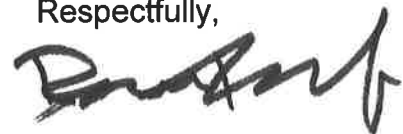
Dear Judge Berman:

We represent **REZA ZARRAB** in the above captioned matter.

We respectfully submit, that given the Government's inaccurate and fundamentally flawed arguments contained in their opposition to our bail application, it is imperative that the Court permit us to submit a brief Reply Memorandum. Because of the intervening Holiday, we respectfully ask permission to file our Reply by Noon on Tuesday, May 31, 2016. We do not seek an adjournment of the Detention Hearing now set for June 2, 2016 at 10:00 a.m., but feel that we must provide your Honor with some very important additional information before the Court is asked to decide this critical issue.

Thank you for the courtesy this Court has always extended to counsel in all matters.

Respectfully,



Benjamin Brafman

cc: *Sidhardha Kamaraju (Sidhardha.Kamaraju@usdoj.gov)*
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