

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	
	:	
v.	:	S4 15 Cr. 867 (RMB)
	:	
REZA ZARRAB, et al.,	:	
	:	
Defendants.	:	
	:	
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**NOTICE OF DEFENDANT  
MEHMET HAKAN ATILLA’S MOTIONS *IN LIMINE***

PLEASE TAKE NOTICE, that, upon the accompanying Memorandum of Law, the Declaration of Cathy Fleming, and the Declaration of David M. Rosenfield, the undersigned will move this Court, before the Honorable Richard M. Berman, in Room 17B of the United States District Court, 500 Pearl Street, New York, New York 10007, for an order granting the following motions *in limine* of Defendant Mehmet Hakan Atilla:

- (a) To preclude the recordings (and fruits) from the Turkish investigation;
- (b) To preclude the government’s proposed expert testimony;
- (c) To preclude the use as evidence at trial of the letter referenced in ¶ 24a of Indictment S4, and the drafts of a similar letter referenced in ¶ 24b; and
- (d) To reserve the right to file additional motions in limine following receipt of the government’s evidence.

PLEASE TAKE FURTHER NOTICE, that, upon prior order of the Court, answering papers, if any, shall be served on or before November 6, 2017.

Dated: New York, New York  
October 30, 2017

HERRICK, FEINSTEIN LLP

FLEMING RUVOLDT PLLC

By: s/Victor J. Rocco  
Victor J. Rocco  
Thomas E. Thornhill  
David M. Rosenfield  
Two Park Avenue  
New York, New York 10016  
(212) 592-1400  
(212) 592-1500 (fax)

By: s/Cathy Fleming  
Cathy Fleming  
Robert Fettweis, *pro hac vice*  
1700 Broadway, 28<sup>th</sup> Floor  
New York, New York 10019  
(212) 706-1850  
(212) 706-1855 (fax)

*Attorneys for Defendant Mehmet Hakan Atilla*