

Exhibit A



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
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July 1, 2013

BY E-MAIL

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Counsel for the Havlish Claimants

Counsel for the Rubin Claimants

**Re: In re 650 Fifth Avenue and Related Proceedings,
08 Civ. 10934 (KBF)**

Dear Counsel:

We write to advise all Counsel that the deposition of Hossein Mahallati has been postponed.

Earlier today, the Government received a request from counsel for the Alavi Foundation and the 650 Fifth Avenue Company (collectively, "Alavi") regarding whether the Government had produced documents provided by Hossein Mahallati in response to a subpoena served on Mr. Mahallati on or about August 17, 2011. Upon receiving Alavi's request, the Government determined that on October 13, 2011, counsel for Mr. Mahallati provided the Government a CD in response to the Government's subpoena. Mr. Mahallati's subpoena production did not include certain documents that counsel for Assa Corp. and Assa Co. Ltd. assert were confidential pursuant to a settlement agreement between the Hanif Partnership, the Alavi Foundation, and Assa.

The documents contained on the CD from Mr. Mahallati were mistakenly filed with the document production from Claimants in this case, based on the fact that Mr. Mahallati was the former president of the Mostazafan Foundation of New York. Once the Government learned that these documents had not been produced, the Government immediately prepared these documents for production and sent them to all Counsel via FedEx, overnight delivery (*see* July 1, 2013 Letter from Anand Sithian to all Counsel, attached hereto as Exhibit A).

Counsel for Alavi has asked that the deposition of Mr. Mahallati be postponed in light of the Government's delay in production. The Government agrees to this request, as the postponement will allow all parties to review the most recent document production.

The Government is in the process of contacting counsel for Mr. Mahallati to arrange a deposition date that is mutually agreeable to counsel for Alavi.

The Government sincerely regrets this oversight and apologizes for the inconvenience caused to all parties. The Government will inform all Counsel when a new deposition date has been selected.

Very truly yours,

PREET BHARARA
United States Attorney for the
Southern District of New York

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**Re: In re 650 Fifth Avenue and Related Proceedings,
08 Civ. 10934 (KBF)**

Dear Counsel:

Enclosed is a CD bearing bates numbers **Hossein_000001–Hossein_003967**.
This CD contains documents produced to the Government by counsel for Mohammed Hossein
Mahallati, in response to a subpoena served on Mr. Mahallati on or about August 17, 2011.

This production is pursuant to the terms of both the Confidentiality Order and the
Privacy Act Order in this case.

Additional responsive records will be produced as they are available.

Very truly yours,

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Encl.