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October 3, 2017

VIA ECF & FEDERAL EXPRESS

The Honorable George B. Daniels,
U.S. District Court Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Citizens for Responsibility and Ethics in Washington v. Trump*
Civil Action No. 1:17-cv-00458-GBD (SDNY)

Dear Judge Daniels:

We represent five legal historians who filed a brief as *amici curiae* (Doc. No.70) in the above-captioned case. We write on behalf of *amici* to correct an error in footnote 82 in that brief.

Although *amici* do not believe footnote 82 bears on an issue which is disputed by the parties in this case, additional research and new information that has come to light since their brief was filed have led them to conclude that footnote 82 is mistaken in representing that Alexander Hamilton himself signed the handwritten manuscript in the National Archives (the so-called "Condensed Report") on which a published document in American State Papers is based. See 1 American State Papers/Miscellaneous 57 (1834). Although the provenance of this manuscript and its surrounding circumstances are not entirely clear, *amici* now believe that the signature on this manuscript is likely not Hamilton's own signature.

Because *amici* relied upon this error on multiple occasions in footnote 82, they no longer believe it will be helpful to the court and respectfully file this errata withdrawing footnote 82.

Respectfully submitted,

/s/ Daniel J. Walker
Daniel J. Walker

cc: All Counsel (via ECF only)