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October 21, 2020

VIA ECF

Hon. Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *United States v. Steven Donziger*, 19 Cr. 561 (LAP); 11 Civ. 691 (LAK)

Dear Judge Preska:

We write on behalf of the United States to supplement the record regarding defense counsel's assertions in her October 18, 2020 letter that: "on or about August 28, 2020, I became the only attorney left working on this case;" and "as of today's date, I have been assigned the lead counsel role and am solely defending this case for trial with only three weeks (Sept. 20-Oct. 16) to prepare." Dkt. 180 at 3.

Ms. Regan correctly states that she is the "sole attorney of record" for the defendant in this case. Dkt. 180 at 3. However, the record should reflect that in our last two telephone conferences with Ms. Regan (October 8 and October 10) to discuss this criminal case, three additional defense attorneys participated in those calls with Ms. Regan on behalf of the Donziger defense team: (1) Ms. Regan's associate at the Civil Liberties Defense Center, Rebecca Chapman Esq., a 2015 Harvard Law graduate who practices criminal defense law, was a former staff attorney in the Criminal Defense Practice with The Bronx Defenders from 2015-2018, and resides in the Boston, Massachusetts area (*see* Exhibit A); (2) New York-based attorney Ronald L. Kuby; and (3) New York-based attorney Rhidaya Trivedi, who practices law with Mr. Kuby.

Mr. Kuby informed us that he is serving as "of counsel" to Ms. Regan for this case. In addition, Ms. Regan indicated to us that Ms. Chapman was assisting her with this case.

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Respectfully submitted,

_____/s/_____
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*Special Prosecutors on behalf of the
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