

TRADITION OF EXCELLENCE

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September 28, 2011

VIA ECF

Honorable Dora L. Irizarry United States District Judge Eastern District of New York Untied States Courthouse 225 Cadman Plaza East Room 4A South Brooklyn, NY 11201-1818

Re: Rosenberg et al. v. Lashkar-e-Taiba et al., 1-10-cv-05381

Scherr v. Lashkar-e-Taiba, 1:10-cv-05382 Chroman v. Lashkar-e-Taiba, 1:10-cv-05448 Ragsdale v. Lashka-e-Taiba, CV-11-3893

Dear Jude Irizarry:

I write to bring to the Court's attention relevant information regarding plaintiffs' action against defendant Inter-Services Intelligence ("ISI") in the above-captioned matter and the ISI's dismissal motion.

Last week, Admiral Michael Mullen, Chairman of the Joint Chiefs of Staff, appeared before the United States Senate Armed Services Committee. In his prepared statement, Admiral Mullen explained that the Haqqani terrorist network in Afghanistan is "in many ways[] a strategic arm" of defendant Inter-Services Intelligence ("ISI"). See Adm. Mullen Prepared Statement, attached hereto as Exhibit A, p. 4. During his testimony before the committee, Admiral Mullen explained that one of ISI's core purposes is the support of extremists and terrorists. See Adm. Mullen Sept. 22, 2011 Testimony to the Senate Armed Services Committee, excerpts of which are attached hereto as Exhibit B. He explained that the recent assault on the United States Embassy in Kabul was done with the ISI's support and that the defendant was also "behind the June 28th attack on the Inter-Continental Hotel in Kabul and a host of other smaller but effective operations." Id.

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277 Dartmouth Street, Boston, MA 02116-2805 Tel: (617) 424-9100 Fax: (617) 424-9120 This recent sworn testimony from Admiral Mullen provides further support for plaintiffs' contention that the ISI is an independent organization operating contrary to the stated goals and purposes of the Government of Pakistan.

We hope to have the opportunity to address this matter when we are before the Court.

Respectfully submitted,

KREINDLER & KREINDLER LEP

By: James P. Kreindler

JPK/gm

cc: Kevin Walsh