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January 27, 2010

BY HAND

The Honorable Jed S. Rakoff
United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 1007

Re: SEC v. Galleon Management, L.P. et al., 09 Civ. 8811(JSR)

Dear Judge Rakoff:


We submit this letter on behalf of our client, defendant Robert Moffat, with respect to the issues raised at the hearing before the Court on January 25, 2010, relating to the SEC's motion to compel defendants Raj Rajaratnam and Danielle Chiesi to produce wiretap material in their possession.

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While we take no position on the motion, to the extent that the Court directs (or permits) defendants Rajaratnam and Chiesi to produce wiretap materials to the SEC, or authorizes the United States Attorney's Office to do so, we respectfully request that the Court direct that all other parties to the litigation be provided with copies of those materials.

To provide the SEC with exclusive access to these wiretap materials for potential use in this case without affording access to those materials to other parties who currently do not have them, such as Mr. Moffat, would obviously be unfair.

Respectfully,

Kenneth I. Schacter

cc: Counsel of record (via email)
Assistant United States Attorney Jonathan Streeter (via email)

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