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**VIA ECF AND FEDERAL EXPRESS**

Hon. Raymond J. Dearie  
United States District Court  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re:** United States v. Zaslavskiy, 17-CR-647 (RJD)  
SEC v. REcoin Group Foundations, LLC, et al., 17-CV-5725 (RJD)

Dear Judge Dearie:

We represent the Defendants in the above-referenced civil case, *SEC v. REcoin Group Foundations, LLC, et al.*, 17-CV-5725 (RJD). As the Court is aware, the civil case is now stayed pending the resolution of the criminal matter *United States v. Zaslavskiy*, 17-CR-647 (RJD). We have previously submitted a Memorandum of Law Supporting Maksim Zaslavskiy's Motion to Dismiss Indictment that briefed our argument that the assets in question could not be considered "securities" under federal securities laws (D.E. 27). Given the importance of this legal question to the Defendants' civil case, we respectfully request leave of this Court, or confirmation from Your Honor that we will be able to address the court, at the argument scheduled for April 27, 2018.

Sincerely,

/s/ Jason A. Nagi

Jason A. Nagi

cc (via ecf):

Assistant United States Attorney Julia Nestor, Esq.  
Federal Public Defender Mildred Whalen, Esq.  
Counsel for the SEC Jorge G. Tenreiro

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