

# AVENATTI & ASSOCIATES, APC

520 Newport Center Drive, Suite 1400  
Newport Beach, CA 92660  
949.706.7000

May 22, 2018

**Via ECF**

The Honorable Kimba M. Wood  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: **Cohen v. United States, 18 Mag 3161 (KMW)**

Dear Judge Wood:

We write to bring an important matter to the Court's attention. We have reason to believe that plaintiff Michael Cohen, or members of his team, have begun to leak select audio recordings to the media that were seized in the FBI raids. We further have reason to believe that these recordings may relate to our client, Ms. Stephanie Clifford. We think that these select leaks are meant to paint a false narrative relating to Mr. Cohen and his business dealings at the same time he is not disclosing numerous other recordings of him speaking with individuals such as Mr. Trump.

We respectfully request that the Court make inquiry of Mr. Cohen's attorneys of these leaks at Thursday's hearing, including, among other things, whether Mr. Cohen's team is the source of the leaks, what was disclosed, and the reasons for the disclosures. Such leaks would plainly call into question the seriousness of Mr. Cohen's arguments opposing my pro hac vice motion. They may also directly interfere with the privilege review being conducted by the Special Master. Further, if the materials publicly disclosed relate to our client, the disclosures would also have relevance to our motion to intervene.

Thank you for your attention to this matter.

Sincerely,

/s/ Michael J. Avenatti

Michael J. Avenatti  
Avenatti & Associates, APC