

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

PASCAL ABIDOR, <i>et al.</i>)	
)	
Plaintiffs,)	Case No.
)	1:10-cv-04059
v.)	
)	(Korman, J.)
JANET NAPOLITANO, <i>et al.</i>)	(Azrack, M.J.)
)	
Defendants.)	
)	

**NOTICE OF WITHDRAWAL OF MOTION FOR RECONSIDERATION AND
CONVERTED MOTION FOR EXPUNGEMENT**

Plaintiffs Pascal Abidor, National Association of Criminal Defense Lawyers, and National Press Photographers Association, through counsel, hereby withdraw their motion for partial reconsideration (ECF No. 38) and all supplemental requests for the Court to alter or amend its December 31, 2013 order (ECF No. 36), including but not limited to their converted alternative motion for return of property pursuant to Federal Rule of Criminal Procedure 41(g) and expungement (ECF No. 46). Plaintiffs will seek no further relief, either in this Court or on appeal, in connection with this case, except Plaintiff Pascal Abidor reserves his right to challenge any unsealing decision.

Respectfully submitted,

/s/ Brian M. Hauss

Brian M. Hauss
Hina Shamsi
American Civil Liberties Union
Foundation
125 Broad St., 18th Floor
New York, NY 10004
Phone: (212) 549-2500
Fax: (212) 549-2583
Email: bhauss@aclu.org

Catherine Crump
University of California, Berkeley
433 Boalt Hall, North Addition
Berkeley, CA 94270
Phone: (510) 292-6860
Email: ccrump@law.berkeley.edu

Kyle O'Dowd
National Association of Criminal
Defense Lawyers
1660 L Street, N.W., 12th Floor
Washington, D.C. 20036
(202) 465-7658

Christopher Dunn
Arthur Eisenberg
New York Civil Liberties Union
Foundation
125 Broad St., 19th Floor
New York, NY 10004
(212) 607-3300

cc: Counsel of Record (via ECF)