



FEDERAL DEFENDER

Middle District of Florida

November 17, 2104

Prashant Khetan
Cause of Action, Inc.
1919 Pennsylvania Avenue, N.W.
Washington, DC 20006

Re: Your Invaluable Assistance in *Yates v. United States*

Dear Mr. Khetan,

I want to thank you personally for Cause of Action's continuing contribution to our cause. We needed succinct and thoughtful *amicus curiae* to support us at the Petition stage as well as in support of our argument before the Supreme Court, and your briefs have served us well. The time and effort given addressing 18 U.S.C. § 1519's propensity for overcriminalization was substantial, and was an important building block in our attempt to limit government overreaching.

We are indebted to you for your help. A heartfelt THANK YOU from me and the entire team on Yates!

Respectfully,

Digitally signed
by Donna Lee
Elm
Date: 2014.11.17

Donna Lee Elm 15:07:42 -05'00'
Federal Defender, FLMD

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