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October 24, 2008

BY FAX

Honorable Shira A. Scheindlin
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: Anderson v. State of New York et al
07 Civ. 9599 (SAS) (AJP)

Dear Judge Scheindlin:

This law firm represents the plaintiff, Christine Anderson, in the above matter.

I am writing regarding a sensitive matter concerning possible witness tampering. I previously advised the opposing counsel of this matter. As you know, Ms. Anderson is suing the State of New York for her wrongful termination as an attorney with the First Judicial Department's Departmental Disciplinary Committee ("DDC"). During discovery, plaintiff deposed a former co-worker, an attorney currently working at the DDC, Nicole Corrado. Ms. Corrado recently contacted my client to tell her that a DDC supervisor, shortly before her deposition, had given her "warning" about the testimony she was to give at the deposition. Ms. Corrado reported this matter to the New York State Supreme Court, Appellate Division, First Department, and spoke with Kay-Ann Porter Campbell, Managing Inspector General for Bias Matters, Office of the Inspector General, New York State Unified Court System. As related to me by Ms. Corrado, Ms. Campbell advised Ms. Corrado that either she or plaintiff's attorney - myself - report this matter to the presiding judge in this action.

I have no basis to believe that Ms. Corrado's deposition testimony regarding the merits of this case was altered as a result of the warning she received. From what I can tell, the supervisor in question was more concerned with what Ms. Corrado might say about the supervisor rather

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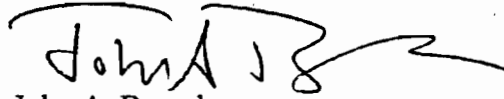
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than with what she might say about the substance of this case. Nonetheless, I believe this is a serious matter, the Office of the Inspector General has recommended that I advise the Court about it, and Ms. Corrado is very upset about the entire experience. For all these reasons, I am now alerting the Court as to this matter.

A court conference is scheduled in this case on October 30, 2008. I would suggest that the parties discuss the matter at that time. Of course, if the Court wants me to provide additional information before that date, I will do so.

Thank you for your attention to this matter.

Respectfully submitted,



John A. Beranbaum

cc: Lee Alan Adlerstein, Assistant Attorney General