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August 4, 2006

**E-Filed and Mailed**

Honorable William B. Shubb  
U.S. Courthouse  
501 "I" Street  
Sacramento, CA 95814

**Re: Letter Request for Sealing and Withdrawal of Pleadings  
(United States v. Mohsen, CR-03-0095 WBS)**

Dear Judge Shubb:

This matter was before the Court yesterday to determine whether I could represent defendant Mohsen in post-conviction proceedings. The objection was that my partner Doron Weinberg's representation of Magda Metwally resulted in an unwaivable conflict of interest. In the course of the hearing on the issue, Ms. Metwally testified regarding various aspects of the attorney-client relationship, and personal financial matters. The Court stated that it appreciated her and my candor.

Although Ms. Metwally's testimony regarding fee arrangements is not privileged, there are, nonetheless, privacy concerns that I have previously expressed. Moreover, in this district, inquiries relating to conflict issues routinely are conducted under seal or in closed session. While yesterday's hearing did not present the typical conflict situation, I have particular concerns because of the inherent lack of clarity regarding representation of Ms. Metwally, as well as Mr. Mohsen.

For these reasons, I am requesting that the Court order the sealing of yesterday's proceeding – especially, Ms. Metwally's testimony – to protect legitimate privacy and privilege interests. Should the conflict issue be raised on appeal, the transcript can, of course, be unsealed.

Additionally, I am asking to withdraw the pleading entitled "Exhibits Re: United States' CJA Reimbursement Motion." It was submitted to ensure that the Court had more complete information regarding the Cadence stock, should the issue arise at the substitution hearing. Inasmuch as the Court denied the substitution, I believe it would not be appropriate for me to make any record regarding the CJA question. New counsel, or existing counsel, should be free to make their own record.

Honorable William B. Shubb  
U.S. District Judge  
Re: Substitution/Conflict Hearing  
*United States v. Mohsen*, CR-03-0095 WSB  
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I mean no disrespect to the Court in proceeding by letter, but I have no standing to make any formal filing. A proposed sealing order, which requires no attorney or client identification is enclosed, however.

Very truly yours,



NINA WILDER

cc: AUSA Robin Harris