



LEAVE TO FILE GRANTED  
Judge C Kollar-Kotelly

10/25/2022

*Ambassador*

*Embassy of Turkey  
Washington, D. C.*

October 22, 2022

Hon. Colleen Kollar-Kotelly  
United States District Judge, District of Columbia  
333 Constitution Avenue N.W.  
Washington D.C. 20001

VIA Overnight Courier and Email  
Kollar-Kotelly\_chambers@dcd.uscourts.gov

Re: *Kurd et al. v. Türkiye, case 1:18-cv-01117 ckk; Usayan et al. v. Türkiye, case 1:18-cv-01141 ckk.*

Your Honor,

In the above-titled actions the Republic of Türkiye has chosen not to participate in the discovery process as recently ordered. Your Honor's unwillingness to delay proceedings in this action for an additional two weeks so that the United States Supreme Court can express its views has forced the parties to proceed prematurely. Respectfully, the Republic of Türkiye remains immune from the jurisdiction of U.S. courts to hear allegations related to how Türkiye defends its president against actual and potential threats from those affiliated with terrorist organizations and will not waive its sovereign rights.

I understand that the conflict between Your Honor's recent orders and Türkiye's immunity has created an ethical quandary that has forced my counsel to move to withdraw from these cases. It is nevertheless my wish that Türkiye continue to benefit from their services. Therefore, I request that their motion be denied.

Thank you for your consideration.

H. Murat MERCAN  
Ambassador