

## BLEAKLEY PLATT

WILL NEW YORK LIGAR PYRECTICUT 914.287.6131 WMULLIGAN@BPSLAW.COM BLEAKLEY PLATT & SCHMIDT, LLP

ONE NORTH LEXINGTON AVENUE WHITE PLAINS, NEW YORK 10601 914.944.2700 FAX: 914.683.6956 BPSLAW.COM

June 27, 2012

Via E-mail

Hon. Jesse M. Furman United States District Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007-1312 USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC 2:
DATE FILED: 427/2

Re:

Keenan v. Dal Bosco, et al. 11 Civ 8500

Dear Judge Furman:

As you know, we represent the plaintiff, Neil F. Keenan, in this matter. For your information, I attach a courtesy copy of Plaintiff's Notice of Voluntary Dismissal pursuant to Rule 41 (a)(1)(A)(i) of the Federal Rules of Civil Procedure, which will be filed electronically with the Court today. I believe this filing effectively moots the Court's outstanding Orders issued in open Court on May 30, 2012, which called for the submission of the following by June 29, 2012.

- 1. Plaintiff's Memorandum of Law pertaining to assertion of subject matter jurisdiction, i.e., the Foreign Sovereign Immunities Act and federal common law, as well as the issue of subject matter jurisdiction with respect to the defendant United Nations in the absence of a waiver of immunity.
- 2. Plaintiff's response to Motion of Proposed Intervenor Christopher-Earl Strunk.

Thank you very much.

Respectfully,

William Hughes Mulligan, Jr.

Weller Hufe Maly

William H. Mulligan, Jr. (WM 2945) BLEAKLEY PLATT & SCHMIDT LLP One North Lexington Avenue White Plains, New York 10601 (914) 949-2700 Tel. (914) 683-5956 Fax wmulligan@bpslaw.com Attorneys for Plaintiff

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

NEIL F. KEENAN, Individually and as Agent for THE DRAGON FAMILY, citizens of foreign states,

Plaintiff,

Defendants.

-against-

DANIELE DAL BOSCO, a citizen of a foreign state, THE OFFICE OF INTERNATIONAL TREASURY CONTROL, a foreign corporation ("OITC"), RAY C. DAM ("DAM"), individually, and as President of OITC, DAVID A. SALE ("SALE"), individually, and as Deputy Chief of the Council for the Cabinet of OITC, the UNITED NATIONS, BAN KI-moon, individually, and as Secretary General of the UN, H.E. Ambassador CESARE MARIA RAGAGLINI, Individually, and as Permanent Representative of the Italian Mission to the UN in New York, H.E. Ambassador LAURA MIRACHIAN. Individually, and as Permanent Representative of the Italian Mission to the UN in Geneva, the ITALIAN REPUBLIC, the ITALIAN FINANCIAL POLICE, Former Prime Minister of Italy, SILVIO BERLUSCONI, THE WORLD ECONOMIC FORUM ("WEF") a foreign corporation, WORLD ECONOMIC FORUM U.S.A., INC., GIANCARLO BRUNO, individually, and as Head of the Banking Industry of WEF, and various unknown individual co-conspirators, JOHN DOES A-Z,

DOCEMENT ELECTRONICALLY FILED DOCEMENT DATE FILED: 6276

USDC SDNY

Index No. 11 Civ. 8500 (JMF)

**NOTICE OF DISMISSAL** 

**ECF CASE** 

TAKE NOTICE that Neil F. Keenan, plaintiff, dismisses this action without prejudice pursuant to Rule 41 (a)(1)(A)(i) of the Federal Rules of Civil Procedure.

Dated: White Plains, New York June 27, 2012

BLEAKLEY PLATT & SCHMIDT, LLP

By:

William H. Mulligan, Jr. (WM 2945)

Attorneys for Plaintiff
One North Lexington Avenue

White Plains, New York 10601 Tel. No. (914) 949-2700

Fax No. (914) 683-6956

www.bpslaw.com

The Clerk of Court is directed to close this case. Any pending motions are moot.

SO ORDERED:

Hon. Jesse M. Furman, U.S.D.J.

Dated: June 27, 2012 New York, New York 10007

Counsel is reminded that in the event this case or a similar case is refiled in this District, that must be brought to the Court's attention on the Civil cover Sheet. In that event the Clerk of Court is directed to assign the new matter to the undersigned.

SO ORDERED

June 27, 2012