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*By First-Class Mail
and Electronic Mail*

The Honorable Scott S. Harris
Clerk of the Court
United States Supreme Court
One First Street, N.E.
Washington, D.C. 20543

Attn: Danny Bickell, Esq.

Re: *AstraZeneca UK Limited, et al. v. Atchley, et al.*, No. 26-245

Dear Mr. Harris:

We write to correct our citation to *Moses v. BNP Paribas, S.A.*, 802 F. Supp. 3d 567 (S.D.N.Y. 2025), at pages 28-29 of respondents' brief in opposition, as an example of a decision "sustaining claims." It has come to our attention that, shortly before our brief was filed, the district court reconsidered that decision and dismissed the complaint. 2026 WL 2925874, at *6 (S.D.N.Y. Sept. 29, 2026). We regret that our brief did not reflect that disposition and apologize for the error.

The reconsideration decision does not otherwise affect the point for which respondents' brief cited *Moses*. As before, *Moses* confirms there is no conflict with *Ashley v. Deutsche Bank Aktiengesellschaft*, 144 F.4th 420 (2d Cir. 2025). In its reconsideration decision, *Moses* cited both *Ashley* and *Atchley* for the governing framework and distinguished *Atchley* on its facts. 2026 WL 2925874, at *3, *6. While *Moses* on reconsideration discerned an insufficient nexus to the attacks there, it described *Atchley* as involving "[a] concrete nexus" between the attacks and petitioners' "cash bribes and free pharmaceuticals." *Id.* at *6.

Respectfully submitted,



Joshua D. Branson
Counsel of Record for Respondents

cc: Counsel for Petitioners