

From: [Ethan Cohen](#)
To: [Teny Geragos](#); [Thomas P. Giuffra](#); echohen@rheingoldlaw.com
Cc: [James C. Knox](#); [Alishah E. Bhimani](#); ebenstein@nylegaljustice.com; tdavis@nmlplaw.com; nino@lamalaw.com; ehallak@harrisbeachmurtha.com; asash@bushellsovak.com; sbernstein@nmlplaw.com; mcuccaro@shertremonte.com; rfriedman@shertremonte.com; rsweeney@mgmlaw.com
Subject: Re: Demand for Immediate Retraction
Date: Thursday, October 15, 2026 10:38:50 AM
Attachments: [image001.png](#)
[image002.png](#)

Dear Ms. Geragos,

Mr. Giuffra is out of town and is currently unavailable. He will respond this evening.

Ethan J. Cohen
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From: Teny Geragos <teny@agilawgroup.com>
Sent: Thursday, October 15, 2026 10:23 AM
To: Thomas P. Giuffra <tgiuffra@Rheingoldlaw.com>; Ethan Cohen <ecohen@Rheingoldlaw.com>; echohen@rheingoldlaw.com <echohen@rheingoldlaw.com>
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Subject: Demand for Immediate Retraction

Dear Mr. Giuffra and Mr. Cohen:

Although we have never met, you have apparently seen fit to make serious and wholly baseless allegations impugning my professional integrity in a public court filing. Separate and apart from the false allegations you and your client have made against my client, you have now personally accused me of unethical conduct in which I have never engaged and would never engage.

I have come to understand that some civil practitioners consider personal attacks and

inflammatory accusations acceptable litigation tactics. I do not. In my years of practicing criminal law, I have never regarded baseless accusations against opposing counsel as a legitimate substitute for advocacy. Your decision to publicly accuse me of professional misconduct without any factual foundation is outrageous, offensive, and entirely unacceptable.

What makes your conduct particularly indefensible is that, despite apparently monitoring my activities and those of a member of my family, you never once contacted me to inquire about the allegations you now purport to make. You made no effort to verify your accusations, seek an explanation, or afford me even the most basic professional courtesy before publishing allegations that directly attack my integrity and reputation. Your failure to do so speaks volumes about the recklessness of your conduct.

To be clear, since you never asked: I have never leaked any information, and your suggestion otherwise is categorically false. You had no legitimate basis to accuse me of doing so, much less to memorialize that accusation in a public judicial filing.

I am demanding that you immediately correct the record by filing a written retraction expressly acknowledging that you have no factual basis to accuse me of leaking information or engaging in any other unethical conduct. That correction must be made publicly, in the same forum in which you chose to publish your accusations.

If you fail to file that correction by tomorrow, I intend to pursue all appropriate relief. I will not permit you to use a court filing as a vehicle to make unsupported allegations that damage my professional reputation without consequence.

You and your colleague are further directed to preserve all documents, communications, electronic messages, research, notes, and other materials relating in any way to the allegations against me, including communications with your client, other counsel, third parties, or anyone involved in investigating, formulating, approving, or disseminating those allegations. This preservation demand includes electronically stored information and any communications concerning me or members of my family.

I expressly reserve all rights and remedies. Confirm receipt.

Teny Geragos



Teny Geragos
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