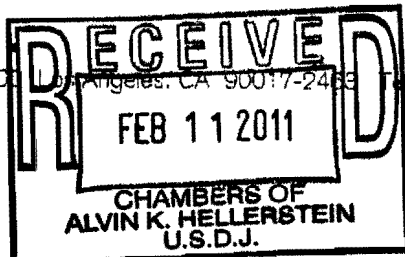


Fairey et al. v. The Associated Press

Doc. 198

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Handwritten signature and date: 2-14-11

BY FACSIMILE

February 11, 2011

Hon. Alvin K. Hellerstein
United States Courthouse
500 Pearl Street
New York, New York 10007
Fax: (212) 805-7942

Re: *Fairey, et al. v. The Associated Press, 09 Civ. 1123 (AKH)(S.D.N.Y.)*

Dear Judge Hellerstein:

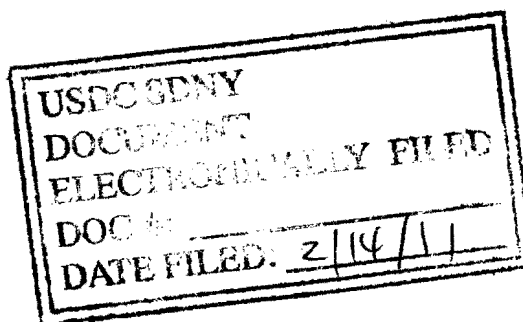
In response to Your Honor's denial without prejudice of the parties' Joint Motion to Redact Certain Confidential Portions of Summary Judgment Papers for Purposes of the Public File filed on January 28, 2011, the parties write jointly to respectfully request that they be permitted to renew their joint request after Your Honor rules on the pending cross-motions for summary judgment.

The parties believe that they will be best able to comply with Your Honor's instruction that any renewed request be limited to specific, relevant documents after Your Honor rules on the pending cross-motions for summary judgment. If Your Honor grants this request, the parties will act expeditiously after Your Honor's ruling on the parties' cross-motions to withdraw their sealing request with respect to certain exhibits, request that certain exhibits be removed from the record, and renew their request only with respect to documents essential to Your Honor's summary judgment ruling. The parties believe that this procedure is in the interests of judicial economy.

Respectfully,

/s/ Laurie C. Martindale
Counsel for One 3 Two, Inc.

/s/Brendan T. Kehoe
Counsel for the Associated Press



cc: All counsel of record.