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March 3, 2021

The Honorable Loretta A. Preska
United States District Judge, Southern District of New York
United States Courthouse, Courtroom 12A
500 Pearl St.
New York, NY 10007-1312

Re: *Berall v. Verathon, Inc. et al.*, C.A. No. 1:10-cv-05777-LAP-DCF

Honorable Judge Preska:

We represent Plaintiff Jonathan Berall, M.D., M.P.H, in the above-referenced matter. Pursuant to Your Honor's Individual Practices, Plaintiff seeks an order permitting to file under seal the following documents:

- An unredacted copy of Plaintiff's Response to Teleflex's Motion for Summary Judgment, filed on March 3, 2021;
- An unredacted copy of Plaintiff's Response to Teleflex's Statement of Undisputed Facts and Dr. Berall's Statement of Additional Materials Facts filed on March 3, 2021;
- An unredacted copy of the Declaration of Dr. Jonathan Berall, filed on March 3, 2021;
- Exhibits 4.1, 4.2, 4.3, 4.4, 4.5, 6.1, and 6.2 to the Declaration of Christopher DeCoro, filed on March 3, 2021.

The redacted sections of the documents listed above include confidential settlement information, including a settlement agreement with confidentiality provisions, financial information, and confidential communications between the parties. Courts in this district have recognized that settlement agreements and financial information are appropriate for redaction. *See, e.g., Seoul Viosys Co., Ltd v. P3 Int'l Co.*, 2018 WL 4759744, 16-cv-6276, Dkt. 164, at 26-27 (S.D.N.Y. Sep. 30, 2018). The redactions also include excerpts from documents this Court has already permitted the parties to file under seal. *See* Dkts. 226, 254.

Accordingly, Plaintiff respectfully requests that this Court enter an order that its Responsive Motion, Statement and Exhibits 4.1, 4.2, 4.3, 4.4, 4.5, 6.1, and 6.2 to the Declaration of Christopher DeCoro may be filed under seal.

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Sincerely,

/s/ Christopher DeCoro
Christopher DeCoro

cc: Counsel of Record

The request to file the above documents under seal is GRANTED.

SO ORDERED.

Dated: March 4, 2021
New York, New York


LORETTA A. PRESKA, U.S.D.J.