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June 21, 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-LABP-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 Verathon's Motion to Transfer, filed on June 21, 2021; and
- Exhibits 1–23, 27–28, 31–34, 36–37, and 39–42 to the Declaration of Stefan Miller, filed on June 21, 2021.

Exhibits 4–23, 27–28, 31–34, 36–37, and 39–42 listed above are marked as "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" by Verathon pursuant to the Stipulated Protective Order entered on February 5, 2021. *See* Dkt. 252. Similarly, Exhibits 1–3 are deposition transcripts designated as "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" pursuant to the Stipulated Protective Order.

Accordingly, Plaintiff respectfully requests that this Court enter an order that unredacted versions of its Response and Exhibits 1–23, 27–28, 31–34, 36–37, and 39–42 to the Declaration of Stefan Miller may be filed under seal.

Sincerely,

SO ORDERED.

/s/ Stefan Miller
Stefan M. Miller

Dated: June 22, 2021
New York, New York


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

cc: Counsel of Record