



Allegaert Berger & Vogel LLP

Writer's email: dshaiman@abv.com

MEMO ENDORSED

ATTORNEYS

111 Broadway, 20th Floor
New York, New York 10006
212.571.0550
212.571.0555 Fax

1199 Route 22 East
Mountainside, New Jersey 07092
908.228.8500
908.228.8515 Fax

www.ABV.com

February 8, 2013

BY HAND

The Honorable Denise L. Cote
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 1610
New York, New York 10007

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FEB 8 2013
OF
COTE

J.T. Colby & Co. et al. v. Apple Inc.,
No. 11-cv-4060 (DLC) (S.D.N.Y.)

Dear Judge Cote:

We are co-counsel to Plaintiffs in the above-referenced action. Pursuant to Section 4(A) of Your Honor's Individual Practices and telephone conversations among the parties' counsel and Your Honor's law clerk, I write to request the Court's approval of the enclosed proposed redactions to Plaintiffs' papers in opposition to Defendant Apple Inc.'s Motion for Summary Judgment and its Motion to Exclude Plaintiffs' expert Robert T. Scherer. No party has requested redactions to Plaintiffs' other opposition papers.

As required by Section 4(A)(1) of Your Honor's Individual Practices, we have enclosed with this letter a binder containing copies of the documents and exhibits wherein redactions are sought, with the words, phrases, or paragraphs to be redacted highlighted. Redactions requested by Plaintiffs are highlighted in green while those requested by Defendant are highlighted in blue. Additionally, as required by Section 4(A)(2) of Your Honor's Individual Practices, we have also enclosed looseleaf sets of solely the pages on which redactions have been requested by placing those unredacted pages in clear sheet protectors immediately following each complete, redacted portion.

We thank the Court for its consideration of this matter.

Approved.
Denise Cote
2/8/13



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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'D. Shaiman', with a long horizontal flourish extending to the right.

David A. Shaiman

Enclosures

cc: All counsel of record (by email, with enclosures by DropBox upload)