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February 28, 2020

**VIA ECF AND FEDEX**

The Honorable Jesse M. Furman  
Southern District of New York  
40 Centre Street, Room 2202  
New York, NY 10007

Michael Calhoon  
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Re: Homeward Residential, Inc. v. Sand Canyon Corp., 12-cv-5067 (JMF/JLC)

Dear Judge Furman:

I write pursuant to Section 6 of the Court's Electronic Case Filing Rules & Instructions and Your Honor's Individual Rules of Practice respectfully to seek leave to file under seal certain materials in connection with Defendant Sand Canyon Corporation's Opposition to Plaintiff's Motion to Exclude Certain Testimony from Defendant's Experts, and to redact from its public filings the Confidential Materials and references thereto. Our papers are due today pursuant to the Court's schedule and will be filed simultaneously.

Counsel for both parties have met and conferred and agree to the confidentiality designations of the documents to be filed under seal. The Confidential Materials are in Defendant Sand Canyon Corporation's Memorandum of Law In Opposition To Plaintiff Homeward Residential, Inc.'s Cross-Motion For Summary Judgment And In Further Support Of Defendant Sand Canyon Corporation's Motion For Summary Judgment, Sand Canyon's Response to Homeward's 56.1 Statement of Facts, Sand Canyon's 56.1 Counter-Statement of Facts, the supporting Declaration of Michael Calhoon, and the exhibits to that Declaration. These Confidential Materials consist of documents and deposition testimony that the parties have designated as "Confidential" and "Highly Confidential" under the Protective Order (ECF No. 66). Due to size, Exhibits 855-862 to the Calhoon Declaration will be submitted on a CD for Your Honor's consideration.

Accordingly, Sand Canyon respectfully requests leave to file the Confidential Materials under seal.

Respectfully submitted,

/s/ Michael Calhoon  
Michael Calhoon

The motion to seal is temporarily GRANTED. The Court will assess whether to keep the materials under seal when deciding the underlying motions. The Clerk of Court is directed to terminate ECF No. 374. SO ORDERED.



cc: All Counsel (by ECF)

March 2, 2020