
BARTON**MEMO ENDORSED**

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ATTORNEYS AT LAW

November 6, 2020

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VIA ECF FILING AND ELECTRONIC MAIL

Hon. Judge Edgardo Ramos,
United States District Judge
United States District Court
Southern District of New York
Courtroom 619
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

bartonesq.com

**Re: *Victor H. Alvarado Balderamo et al. v. Go New York
Tours Inc. and Asen Kostadinov,***
Case No. 15 Civ. 2326 (ER)

Dear Judge Ramos:

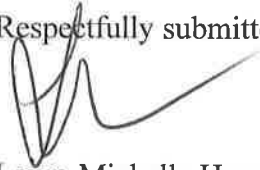
Defendants Go New York Tours Inc. (“Go New York”) and Asen Kostadinov (“Mr. Kostadinov”) respectfully submit this letter requesting a Local Civil Rule 37.2 Conference prior to making a motion to enforce confidentiality designations that Plaintiffs’ counsel, John Gurrieri, Esq., advised me today that they will not honor. Additionally, when I attempted to discuss the reasons why Defendants designated each category of documents “Confidential” or “Confidential – Attorneys’ Eyes Only” during our scheduled call today, counsel refused to discuss any specific documents with me. He said that, as to any and all documents produced by Defendants, it is his position is simply that “he has no obligation to sign a confidentiality stipulation.”

Counsel’s categorical objection to honor any of the confidentiality designations that have made to date as to documents that Defendants have already produced, and his ongoing refusal to sign a standard Stipulation and Order of Confidentiality that was provided to him weeks ago (a copy of which is annexed hereto as Exhibit “A”) is troubling to say the least. The highly confidential documents in this case include, among other things, communications and documents relating to the NYSDOL’s investigation of Go New York, confidential settlement agreements entered into by Go New York and former employees, and sensitive commercial information in contracts entered into by Go New York with third-parties to provide employee leasing services.

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Defendants request a Local Civil Rule 37.2 conference with the Court to resolve this dispute as soon as the Court's schedule permits.

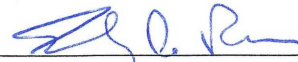
Respectfully submitted,



Laura-Michelle Horgan

Encl.

Plaintiffs are instructed to respond by no later than November 10, 2020. The response will be limited to three pages.



Edgardo Ramos, U.S.D.J
Dated: 11/6/2020
New York, New York