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November 17, 2023

**Via ECF**Hon. Valerie Figueredo  
United States District Court  
for the Southern District of New York  
500 Pearl Street  
New York, New York 10007Re: *United States ex rel. Bassan v. Omnicare, Inc.*, No. 15 Civ. 4179 (CM) (VF)

Dear Judge Figueredo:

Under Your Honor's Individual Practices Rule I.g, and the Protective Order in this action, we write to request the Court's permission to file conditionally under seal an unredacted version of the opposition to the government's motion to modify the scheduling order (ECF 385), as well as excerpts from two deposition transcripts cited in the filing. Although Defendants do not believe that any portion of the letter or deposition excerpts should be kept confidential, the depositions were taken recently and the Protective Order requires Defendants to treat them as presumptively confidential at this time.

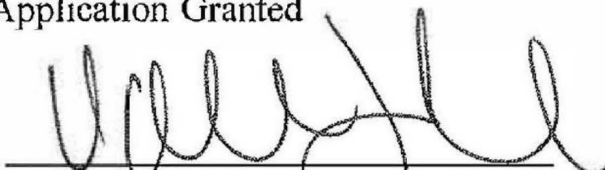
We appreciate the Court's consideration.

Sincerely,

/s/ David Randall J. Riskin

David Randall J. Riskin

Application Granted

  
Valerie Figueredo, U.S.M.J.

DATED: November 20, 2023

The Clerk of Court is respectfully directed to terminate the motion at ECF No. 393.