LAW OFFICES

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December 5, 2023

## Via ECF

Hon. Valerie Figueredo United States District Court for the Southern District of New York 500 Pearl Street New York, New York 10007

Re: United States ex rel. Bassan v. Omnicare, Inc., No. 15 Civ. 4179 (CM) (VF)

Dear Judge Figueredo:

Under Rule I.g of Your Honor's Individual Practices, and the protective order in this action (ECF 102), we write to request the Court's permission to file under seal (i) Exhibits B and C to Omnicare's contemporaneously filed motion to compel; and (ii) an unredacted version of the motion, which quotes from the exhibits. Omnicare disagrees the materials should be sealed, as explained previously. (ECF 392.)

Omnicare has filed a redacted version of its motion on the public docket.

Sincerely,

/s/ David Randall J. Riskin

David Randall J. Riskin

Application Granted

Valerie Figueredo, U.S.M.

DATED: December 6, 2023

The Clerk of Court is respectfully directed to terminate the motion at ECF No. 406.