

**U.S. Department of Justice**

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

March 29, 2024

By ECF

The Hon. Valerie Figueredo
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States ex rel. Bassan et al. v. Omnicare, Inc. & CVS Health Corp.*,
15 Civ. 4179 (CM) (VF)

Dear Judge Figueredo:

We write respectfully on behalf of the United States of America (the “Government”) to request the Court’s leave to file several exhibits to the Government’s letter filed today under a temporary 14-day seal, pursuant to Rule I.g of Your Honor’s Individual Practices and the Protective Order entered by the Court on November 29, 2021. *See* Dkt. No. 102 (the “Protective Order”).

In producing materials in discovery, Defendants designated certain documents as subject to the Protective Order. The Protective Order provides a process for the filing of such materials. Protective Order ¶ 19. Pursuant to that process, the Government respectfully requests that the Court grant leave to file Exhibits C through M to the Government’s letter and the portions of the letter discussing those exhibits under seal for a period of 14 days. *See id.* Per the Protective Order, Defendants, as the Producing Parties, may file a motion to seal the relevant information. *See id.*

We thank the Court for its consideration of this submission.

MEMO ENDORSED

HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE
DATED: April 1, 2024

The request for leave to file exhibits under a temporary seal is granted. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 448 and to maintain ECF Nos. 449 and 449-1 through 449-13 under seal. After 14 days, the Court will advise the Clerk of Court to remove the viewing restrictions.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: /s/ Jennifer Jude
MÓNICA P. FOLCH
JENNIFER JUDE
SAMUEL DOLINGER
LUCAS ISSACHAROFF
JEREMY LISS
Assistant United States Attorneys
(212) 637-2800