

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

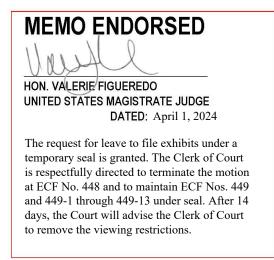
Re: United States ex rel. Bassan et al. v. Omnicare, Inc. & CVS Health Corp., 15 Civ. 4179 (CM) (VF)

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.



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Respectfully submitted,

DAMIAN WILLIAMS United States Attorney

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