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April 20, 2021

VIA ECF

The Honorable John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

*Application granted,
so ordered.
per G/Koeltl
U.S.D.S.
4/21/21*

RE: Katharina Roelcke v. Zip Aviation, LLC, et al.
Civ. No. 15-cv-06284-KGK-JLC

Dear Judge Koeltl:

We represent Defendants Zip Aviation, LLC, Manhattan Helicopters LLC, and Itai Shoshani in the above-referenced action. Concurrently with this letter, we are filing Defendants' (1) reply memorandum of law in further support of their motion for summary judgment; and (2) reply declaration of Shawn P. Naunton in support of defendants' reply memorandum of law in further support of their motion for summary judgment ("Reply Declaration"), with exhibits. In accordance with the Court's Individual Practice Rules VI(A)(1) and (2), we write to explain the reason Defendants seek to file Exhibits 14 and 19 to the Reply Declaration under seal.

Exhibits 14 and 19 contain explicit photographs and have been designated "Highly Confidential – Attorneys' Eyes Only" to protect plaintiff's privacy interests pursuant to the protective order issued on March 31, 2020. ECF No. 72.

Given the foregoing, ^{Doc 132} Defendants respectfully request that the Court allow the above-referenced documents to be filed under seal and permit only counsel and court personnel to view the proposed sealed documents. *See* Rule 6.5(a) of the SDNY ECF Rules & Instructions.

Respectfully submitted,

/s/ Shawn P. Naunton

Shawn P. Naunton

cc: Counsel of Record (via ECF)