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May 12, 2020

The Honorable Paul A. Engelmayer  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: *Letter Motion for Approval of Redacted Filing in FUJIFILM  
Manufacturing U.S.A., Inc. v. Goldman Sachs & Co., Case No. 1:15-cv-  
08307-PAE (S.D.N.Y.)***

Dear Judge Engelmayer,

We write on behalf of Defendant Glencore International AG (“GIAG”) in reference to the Answer being filed today by GIAG in response to the Amended Complaint of Plaintiff FUJIFILM Manufacturing U.S.A., Inc. (“Plaintiff”), dated February 4, 2016 (the “Amended Complaint”). Plaintiff’s Amended Complaint was filed “under seal pursuant to the Protective Order entered in the case (ECF No. 381) and the Court’s Order, ECF No. 100.” (ECF. No. 104, Plaintiff FujiFilm Manufacturing U.S.A. Inc.’s Notice of Filing Under Seal Pursuant to the Court’s Order) The pertinent redacted allegations of the Amended Complaint were based on Discovery Material designated as Confidential.

Accordingly, in order to prevent improper public disclosure of protected information, GIAG respectfully requests leave of the Court to file its Answer under seal. To the extent that GIAG’s Answer contains responses based on information designated as Confidential, GIAG has redacted such responses. Pursuant to Section (4)(B)(2) of Your Honor’s Individual Rules and Practices in Civil Cases, GIAG is: “(a) publicly fil[ing] the document with the proposed redactions, and (b) electronically fil[ing] under seal a copy of the unredacted document with the proposed redactions highlighted” through the ECF system.



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We are available to discuss this request at the Court's convenience.

Respectfully submitted,


/s/ Eliot Lauer  
Eliot Lauer

cc: All counsel (via ECF)

5/13/2020

The Court has reviewed the proposed redactions and grants the requests of Glencore International AG and Access World (Vlissingen) B.V. to file their answers under seal, Dkts. 186, 189.

SO ORDERED.

  
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PAUL A. ENGELMAYER  
United States District Judge