

Application granted

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SO ORDERED:

Date: 2/17/2022 *Richard M. Berman*  
Richard M. Berman, U.S.D.J.BRUCE E. MENKEN  
SCOTT SIMPSON  
JASON J. ROZGER <sup>Δ</sup>  
BRENNA RABINOWITZ  
RAYA F. SAKSOUK<sup>Δ</sup> ALSO ADMITTED NJALAN SERRINS  
OF COUNSEL

February 16, 2022

**BY ECF**Hon. Richard M. Berman, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007Re: Grottano, et al. v. City of New York, et al., 15-CV-9242 (RMB) (KNF)

Your Honor:

This firm is co-counsel for Plaintiffs in the above-captioned case. In accordance with Your Honor's Individual Rules of Practice, Sec. 4(A), I write to respectfully request that all exhibits to Plaintiff's forthcoming letter-motion on behalf of minor and incapacitated class members be filed under seal, with access only to selected parties. These exhibits will consist of class members' Supplemental Information and Certification Forms ("SIF"), which contain their contact information (and/or that of their parents) alongside intimate details about their invasive searches. For parents and children who are victims of domestic violence, as in the case of at least one minor class member's mother, these details are all the more sensitive.

The City has advised Plaintiffs' counsel that it has no objection to the filing of these documents under seal. We thank the Court for its consideration of this request.

Respectfully submitted,

*s/ Raya F. Saksouk*