

ALIOTO LAW FIRM

ONE SANSOME STREET
35TH FLOOR
SAN FRANCISCO, CALIFORNIA 94104

TELEPHONE (415) 434-8900
FACSIMILE (415) 434-9200

August 31, 2020

The Honorable Lorna G. Schofield
United States District Judge
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Filed via ECF

Re: Nypf, et al. v. JPMorgan Chase & Co, et al.,
Case No. 1:15-cv-9300

Dear Judge Schofield:

The *Nypf* Plaintiffs respectfully request approval to file the letter in response to Defendants August 22, 2020, letter motion (Dkt. Nos. 624, 627, 628) under seal and in redacted form, pursuant to Rule I.D.3 of Your Honor's Individual Rules and Procedures for Civil Cases ("Individual Rules").

The letter response contains references to information designated by Defendants as confidential/highly confidential pursuant to the Stipulation and Order of Confidentiality entered by the Court on November 13, 2017 (Dkt. No. 249). In accordance with this Court's Individual Rules, Plaintiffs have provisionally redacted references to material designated as confidential/highly confidential by Defendants. Pursuant to Rule I.D.3 of this Court's Individual Rules, however, the party "with an interest in confidential treatment bears the burden of persuasion." Individual Rules, Rule I.D.3. In this case, Defendants, as the parties that made the relevant confidentiality designations, are those with an interest in confidential treatment. Accordingly, Defendants should "promptly file a letter on ECF within two business days in support of the motion," explaining why they seek to have the joint letter filed in redacted form pursuant to Rule I.D.3 of this Court's Individual Rules.

Plaintiffs further respectfully reserve the right to challenge the Defendants' confidentiality designations in the future pursuant to Stipulation and Order of Confidentiality. Nevertheless, Plaintiffs submit this letter consistent with the applicable procedures set forth in the Court's Individual Rules where the filing party is not the party asserting an interest in the confidential treatment of the redacted information.

In accordance with Your Honor's Individual Rules and the Confidentiality Order, the *Nypf* Plaintiffs respectfully request that this Court grant it permission to file the letter opposition under seal and in redacted form.

Hon. Lorna G. Schofield
August 31, 2020
Page 2 of 2

Respectfully submitted,

ALIOTO LAW FIRM

By: /s/ Joseph M. Alioto
Joseph M. Alioto

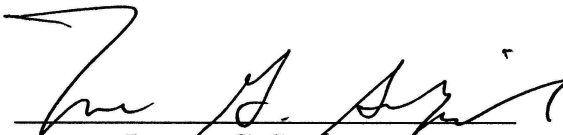
*Attorneys for Plaintiffs and All Others
Similarly Situated*

C: All Counsel by ECF

Application GRANTED. Plaintiffs may file the letter in response to Defendants' August 22, 2020, letter motion (Dkt. Nos. 624, 627, 628), under seal and in redacted form.

Pursuant to Individual Rule D.3, Defendants shall file any letter in support of Plaintiffs' motion to file in redacted form by **September 2, 2020**.

Dated: September 1, 2020
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

APPENDIX OF PARTIES AND ATTORNEYS OF RECORD

<p>Joseph M. Alioto Thomas P. Pier Jamie L. Miller Alioto Law Firm One Sansome Street, Suite 3500 San Francisco, CA 94104 Telephone: (415) 434-8900 Facsimile: (415) 434-9200 Email: jmalioto@aliotolaw.com Email: jmiller@aliotolaw.com</p> <p><i>Attorneys for Plaintiffs</i></p>	<p>Lingel H. Winters Law Offices of Lingel H. Winters 388 Market Street, Suite 1300 San Francisco, California 94111 Tel: (415) 398-2941 Fax: (415) 393-9887 Email: sawmill2@aol.com</p> <p><i>Attorneys for Plaintiffs</i></p>
<p>Christopher A Nedeau Nedeau Law Firm 154 Baker Street San Francisco, CA 94117-2111 415-516-4010 Email: cnedeau@nedaulaw.net</p> <p><i>Attorneys for Plaintiffs</i></p>	<p>Lawrence Papale Law Offices of Lawrence G. Papale 1308 Main Street, Suite 117 St. Helena, CA 94574 707-963-1704 Email: lgpapale@papalelaw.com</p> <p><i>Attorneys for Plaintiffs</i></p>
<p>Adam Selim Hakki Jeffrey Jason Resetarits Richard Franklin Schwed Stephen D. Hibbard Shearman & Sterling LLP (NY) 599 Lexington Avenue New York, NY 10022 Email: ahakki@shearman.com Email: jeffrey.resetarits@shearman.com Email: rschwed@shearman.com Email: stephen.hibbard@shearman.com</p> <p><i>Attorneys for Bank of America, N.A., Bank of America Corporation</i></p>	
<p>James Matthew Goodin Julia C Webb Locke Lord LLP 111 S Wacker Dr Chicago, IL 60606 Email: jmgoodin@lockelord.com Email: jwebb@lockelord.com</p> <p><i>Attorneys for HSBC Bank (USA), N.A., HSBC North American Holdings Inc.</i></p>	<p>Regina Jill McClendon Locke Lord LLP 44 Montgomery Street, Suite 4100 San Francisco, CA 94104 Email: rmcclendon@lockelord.com</p> <p><i>Attorney for HSBC Bank (USA), N.A., HSBC North American Holdings Inc.</i></p>

<p>Gregory Thomas Casamento Locke Lord LLP (NYC) 3 World Financial Center, 20th Floor New York, NY 10001 Email: gcasamento@lockelord.com</p> <p><i>Attorney for HSBC Bank (USA), N.A., HSBC North American Holdings Inc.</i></p>	<p>Roger Brian Cowie Locke Lord LLP 2200 Ross Avenue Suite 2200 Dallas, TX 75201 Email: rcowie@lockelord.com</p> <p><i>Attorney for HSBC Bank (USA), N.A., HSBC North American Holdings Inc.</i></p>
<p>Micah G. Block Davis Polk & Wardwell (Menlo Park) 1600 El Camino Real Menlo Park, CA 94025 Email: micah.block@davispolk.com</p> <p><i>Attorney for Royal Bank of Scotland, plc</i></p>	<p>Neal Alan Potischman Paul Steel Mishkin Adam Gabor Mehes John Michael Briggs Maude Paquin Alyssa Beaver Gomez Lewis Charles Shioleno Davis Polk & Wardwell LLP (NYC) 450 Lexington Avenue New York, NY 10017 Email: Neal.Potischman@dpw.com Email: paul.mishkin@dpw.com Email: adam.mehes@davispolk.com Email: john.briggs@davispolk.com Email: maude.paquin@davispolk.com Email: alyssa.gomez@davispolk.com Email: shioleno@gmail.com (Inactive)</p> <p><i>Attorneys for Royal Bank of Scotland, plc</i></p>
<p>Gretchen Wolf Skadden, Arps, Slate, Meagher & Flom, LLP 155 North Wacker Drive Suite 2700 Chicago, IL 60606-1720 Email: gretchen.wolf@skadden.com</p> <p><i>Attorney for JP Morgan Chase & Co., JPMorgan Chase Bank, N.A.</i></p>	<p>Harry Peter Koulos Tansy Woan Boris Bershteyn Skadden, Arps, Slate, Meagher & Flom LLP One Manhattan West New York, NY 10001-8602 Email: harry.koulos@skadden.com Email: tansy.woan@skadden.com Email: boris.bershteyn@skadden.com</p> <p><i>Attorneys for JP Morgan Chase & Co., JPMorgan Chase Bank, N.A.</i></p>

<p>Alan M. Wiseman Andrew D. Lazerow Covington & Burling, L.L.P. (DC) One City Center, 850 10th Street NW Washington, DC 20001 Email: awiseman@cov.com Email: alazerow@cov.com</p> <p><i>Attorneys for Citigroup, Inc., Citicorp, Citibank, N.A.</i></p>	<p>Andrew Arthur Ruffino Covington & Burling LLP(NYC) 620 Eighth Avenue New York, NY 10018-1405 Email: aruffino@cov.com</p> <p><i>Attorney for Citigroup, Inc., Citicorp, Citibank, N.A.</i></p>
<p>Tammy Albarran Covington and Burling LLP One Front Street 35th Floor San Francisco, CA 94111 Email: talbarran@cov.com</p> <p><i>Attorney for Citigroup, Inc., Citicorp, Citibank, N.A.</i></p>	<p>David Jarrett Arp Melanie Leigh Katsur Gibson, Dunn & Crutcher, LLP (DC) 1050 Connecticut Avenue, N.W. Washington, DC 20036 Email: jarp@gibsondunn.com Email: mkatsur@gibsondunn.com</p> <p><i>Attorneys for UBS AG</i></p>
<p>Eric Jonathan Stock Gibson, Dunn & Crutcher, LLP (NY) 200 Park Avenue New York, NY 10166 Email: estock@gibsondunn.com</p> <p><i>Attorney for UBS AG</i></p>	<p>Adam Seth Paris Sullivan & Cromwell LLP (Los Angeles) 1888 Century Park East, Suite 2100 Los Angeles, CA 90067 Email: parisa@sullcrom.com</p> <p><i>Attorney for Barclays PLC, Barclays Capital, Inc.</i></p>
<p>David Harold Braff Sullivan and Cromwell, LLP(NYC) 125 Broad Street New York, NY 10004 Email: braffd@sullcrom.com</p> <p><i>Attorney for Barclays PLC, Barclays Capital, Inc.</i></p>	<p>Jeffrey T. Scott Kathleen Suzanne McArthur Maeghan Owen Mikorski Matthew Alain Peller Matthew Alexander Schwartz Yvonne Susan Quinn Sullivan and Cromwell, LLP(NYC) 125 Broad Street New York, NY 10004 Email: scottj@sullcrom.com Email: mcarthurk@sullcrom.com Email: mikorskim@sullcrom.com Email: pellerm@sullcrom.com Email: schwartzmatthew@sullcrom.com Email: quinny@sullcrom.com</p> <p><i>Attorneys for Barclays PLC, Barclays Capital, Inc.</i></p>

