



MEMO ENDORSED

Ian C. Ballon
Ballon@gtlaw.com
L.A. Direct Dial: 310.586.6575
Palo Alto Direct Dial: 650.289.7881

October 4, 2023

Hon. Sidney H. Stein
U.S. District Court, Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Graham v. Prince, et al., No. 1:15-cv-10160-SHS (S.D.N.Y.) –
Redaction and Sealing of Documents

Dear Judge Stein:

We represent Defendants Richard Prince in the above-referenced case and write on behalf of ourselves and Defendants Laurence Gagosian and Gagosian Gallery, Inc. (the "Gagosian Defendants," and collectively with Mr. Prince, the "Defendants"). We submit this letter pursuant to Section 5(B) of Your Honor's Individual Practices.

Certain portions of the Memorandum of Law in Support of Defendants' Motion for Security for Costs Pursuant to Local Rule 54.2, and the exhibits attached to the accompanying Declaration, have been designated by Plaintiff Donald Graham and the Gagosian Defendants as "Confidential" and/or "Highly Confidential – Attorneys' Eyes Only" (the "Protected Material") under the Stipulated Protective Order entered in this case on January 29, 2018. The Protected Material includes information that Plaintiff and the Gagosian Defendants have previously identified as confidential commercial/business information, non-public financial information, and/or confidential customer information. Accordingly, we respectfully request an Order permitting Defendants to file under seal documents containing purportedly Protected Material, and briefing papers to the extent they reflect any such Protected Material. Where possible and to the extent necessary, Defendants also request permission to file placeholders and/or redacted versions of such documents, testimony, and papers via ECF.

Thank you for your consideration of this important argument and issue.

cc: Counsel of Record (via ECF) Respectfully submitted,

The requests as set forth above are granted.

[Signature]

Dated: New York, New York
October 5, 2023

Ian C. Ballon

SO ORDERED:

[Signature of Sidney H. Stein]
Sidney H. Stein, U.S.D.J.

- Albany
Amsterdam
Atlanta
Austin
Berlin
Boston
Charlotte
Chicago
Dallas
Delaware
Denver
Fort Lauderdale
Houston
Las Vegas
London*
Long Island
Los Angeles
Mexico City+
Miami
Milan»
Minneapolis
New Jersey
New York
Northern Virginia
Orange County
Orlando
Philadelphia
Phoenix
Portland
Riyadh*
Sacramento
Salt Lake City
San Diego
San Francisco
Seoul*
Shanghai
Silicon Valley
Singapore*
Tallahassee
Tampa
Tel Aviv^
Tokyo*
Warsaw~
Washington, D.C.
West Palm Beach
Westchester County

Operates as Greenberg Traurig Osborn, LLP.
*A separate UK registered legal entity.
Greenberg Traurig, S.C.; Greenberg Traurig
Santa Maria; Greenberg Traurig LLP Foreign
Legal Consultant Office; A branch of Greenberg
Traurig, P.A. Florida, USA; GT Tokyo Hattori
Amorino and Greenberg Traurig
Osaka/Kobe/Miyazaki/Amurita; Greenberg
Traurig Nowakowski Zmoch Wyszynski sp. z o.o.;
Greenberg Traurig Singapore LLP which is
licensed as a foreign law practice in Singapore;
Greenberg Traurig, P.A. is applying to register a
joint venture in Saudi Arabia