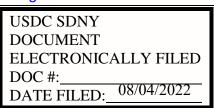
SEWARD & KISSEL LLP

ONE BATTERY PARK PLAZA NEW YORK, NEW YORK 10004

WRITER'S DIRECT DIAL:

(212) 574-1448

TELEPHONE: (212) 574-1200 FACSIMILE: (212) 480-8421 WWW.SEWKIS.COM



901 K STREET, NW WASHINGTON, DC 20001 TELEPHONE: (202) 737-8833 FACSIMILE: (202) 737-5184

August 3, 2022

VIA ECF

Honorable Valerie E. Caproni United States District Judge United States District Court Southern District of New York 40 Foley Square New York, NY 10007

Re: Fujian Ocean Shipping Co. Ltd. v. O.W. Bunker Far East (S) Pte. Ltd., et al. (No. 16-cv-401)

Dear Judge Caproni:

We write on behalf of ING Bank N.V., as Security Agent ("<u>ING</u>"), with the consent of Global Energy Trading Pte Ltd. ("<u>GET</u>") and Fujian Ocean Shipping Co. Ltd. ("<u>Fujian</u>" and, together with ING and GET, the "<u>Parties</u>").

Further to the Court's Opinion & Order requesting clarification concerning the Parties' proposed stipulation or, alternatively, a revised proposed stipulation and order accounting for the entire Interpleader Fund (Doc. 109), the Parties herewith submit an Amended Stipulation and Proposed Order for Discharge, Dismissal With Prejudice, and Transfer of Funds, dated August 3, 2022. ING respectfully requests that, for the same reasons set forth in its motion to seal the Parties' original stipulation and proposed order (Doc. 105), which the Court granted on August 2, 2022 (Doc. 108), the Court (1) seal the highlighted portions of the enclosed amended stipulation and (2) seal the docket entry reflecting the amount of the withdrawal from the Court Registry Investment System.

We stand ready to address any questions the Court may have as to this application and thank the Court for its consideration.

Respectfully submitted,

Brian P. Malopey

Hon. Valerie E. Caproni August 3, 2022 Page 2

Enclosure

Cc: Bruce G. Paulsen (<u>paulsen@sewkis.com</u>) James Power (<u>james.power@hklaw.com</u>) Marie Larsen (<u>marie.larsen@hklaw.com</u>) Thomas Belknap (<u>TBelknap@BlankRome.com</u>)

Application GRANTED.

SO ORDERED.

Valene Que 08/04/2022

HON. VALERIE CAPRONI UNITED STATES DISTRICT JUDGE