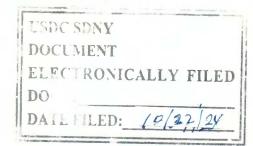
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October 18, 2024

## VIA CM/ECF

The Honorable Louis L. Stanton United States District Court for the Southern District of New York 500 Pearl Street, Room 2250 New York, NY 10007





Re: United States ex rel. Foreman v. AECOM, et al., No. 1:16-cv-01960 (LLS) (S.D.N.Y.)

Dear Judge Stanton:

I write on behalf of Relator to request that Relator be permitted to file his Memorandum of Law in Opposition to Defendants' Motion for Summary Judgment and accompanying declarations from Dan Olejko, Kellie Fedkenheuer, and Jason Boberg under seal. See Dkt. 201.

Relator files this motion because the foregoing documents reference documents, communications, and materials produced by Defendants that Defendants have designated as Confidential or Highly Confidential pursuant to the Protective Order. See Dkt. 66. Relator's Memorandum of Law in Opposition to Defendants' Motion for Summary Judgment and accompanying exhibits references, displays, paraphrases, and/or quotes communications, and materials produced by Defendants that Defendants have designated as Confidential or Highly Confidential. Relator takes no position on the confidentiality of the documents, communications, and materials produced by Defendants that Defendants have designated as Confidential or Highly Confidential but requests to file under seal as a precaution.

Respectfully submitted,

Jeffrey R. Bragalone

Denied. Louis L. Stanton 10/22/24 Bragalone Olejko Saad PC 901 Main Street, Suite 3800

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CC: Counsel of Record (by ECF)