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January 29, 2021

VIA ECF

Hon. Naomi Reice Buchwald, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007-1312

Re: Cesari S.R.L. v. Peju Province Winery L.P. et al.
Case No. 17-cv-00873 (NRB)

Dear Judge Buchwald:


We are counsel to Peju Province Winery L.P., Peju Family Operating Partnership, L.P., and Peju Province Corporation (collectively, “defendants”) in connection with the above-captioned matter. We write to the Court now pursuant to § H(2) of Your Honor’s Individual Practices in search of leave to file documents in connection with defendants’ motion for sanctions under seal. Specifically, the documents we request be filed under seal are:


- The Declaration of Kandiss Schulz with one accompany exhibit;
- The Declaration of Ariana Peju;
- The Declaration of Joel MacMull with three accompany exhibits;

The basis for defendants’ request that these documents be sealed arises from their inclusion of confidential and/or proprietary financial information as it pertains to the defendants’ business operations.

Application granted,
pending further review by
the Court.

Respectfully submitted,


NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE


Joel G. MacMull

Dated: New York, New York
February 1, 2021

cc: All Counsel of Record (via ECF only)