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By ECF

November 3, 2023

Hon. Naomi Reice Buchwald
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

**RE: Cesari S.R.L. v. Peju Province Winery L.P. et al., 17 Civ. 873
Application To Seal Exhibits to Various Declarations in Support of
Plaintiff's Motion for Costs, Attorney's Fees and Interest**

Dear Judge Buchwald:

I write on behalf of Cesari ("Plaintiff") to respectfully request that the Court allow Plaintiff to file the below documents under seal for the following reasons.

First set of documents (from Defendants' production) – Plaintiff cited in its Memorandum of Law in Support of its Motion for Costs, Fees and Interest ("Motion") and supporting Declaration titled the "Exhibits Declaration" (ECF 479), certain documents that the Peju Defendants produced in discovery and marked confidential. Specifically, those documents are:

1. MS Peju 5760-5761 (Marked as Exhibit 2)
2. MS Peju 5194 (Marked as Exhibit 3)
3. MS Peju 3007-3008 (Marked as Exhibit 4) (also at Defs.' Trial Exhibit DX-26)
4. MS Peju 1890-1891 (Marked as Exhibit 10)

In light of Peju's designations, Cesari moves to file these documents under seal.

Second set of documents (from Plaintiff's confidential and attorney-client privileged materials) – Plaintiff also cites in her Fees Declaration in support of its Motion materials of a confidential nature consisting of my Firm's Engagement Letter with Plaintiff, my Firm's standard rates, and numerous billing and time records pertaining to nearly 7 years of litigation in this action that are confidential to my client. While we performed a privilege review and made as few redactions as possible, the detailed time records still contain confidential client material.

For the foregoing reasons, Cesari respectfully requests that the foregoing application be granted.

Respectfully submitted,




Valeria Calafiore Healy
Attorney for Plaintiff Cesari S.R.L.

cc: All counsel of record (by ECF)

The application to temporarily file these documents under seal is granted.

So ordered.



NAOMI REICE BUCHWALD

UNITED STATES DISTRICT JUDGE

Dated: November 6, 2023
New York, New York