

THE
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May 7, 2020

Application granted.

VIA ECF

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


NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE

Dated: May 8, 2020

Re: *Ibroci v. Ivan Sergio Idrovo and JC Transport Inc.*
S.D.N.Y. Case No.: 17-cv-01449-NRB

Dear Judge Buchwald:

I represent the plaintiffs. I am writing to comply with the Court's instruction to inform the Court and Defense Counsel of Plaintiff's decision regarding the disputed disclosure of Dr. Davatzikos' data. I have reached an agreement with Defense Counsel, Dr. Davatzikos, and defense expert Dr. Provenzale regarding a mutually acceptable disclosure subject to a mutually acceptable Confidentiality Non-Disclosure Agreement. Once Defense Counsel and Dr. Provenzale send me an executed copy of that Agreement, Dr. Davatzikos will make the agreed-upon disclosure.

I am also writing to request leave on behalf of both plaintiffs and defendants to make all future filings pertaining to said disclosure under seal. One of the conditions under which Dr. Davatzikos can make the agreed-upon disclosure is that all filings pertaining thereto be made under seal.

Respectfully submitted,


Jordan Hoch (JH8983)

CC (via ECF):
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