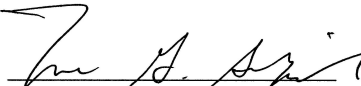


BAKER BOTTS LLPONE SHELL PLAZA
910 LOUISIANA
HOUSTON, TEXAS
77002-4995TEL +1 713.229.1234
FAX +1 713.229.1522
BakerBotts.comAUSTIN
BEIJING
BRUSSELS
DALLAS
DUBAIHONG KONG
HOUSTONLONDON
MOSCOW
NEW YORK
PALO ALTO
RIYADHSAN FRANCISCO
WASHINGTON

December 13, 2021

VIA ELECTRONIC FILINGHon. Lorna G. Schofield
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007**By December 21, 2021**, Plaintiffs shall file a response to this letter, identifying any excerpts of deposition testimony that require confidential treatment.**Dated: December 14, 2021**
New York, New York
LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGERe: *In re Chicago Bridge & Iron Company N.V. Sec. Litig.*, No. 1:17-cv-1580-LGS

Dear Judge Schofield:

Pursuant to Rule I.D. of Your Honor's Individual Rules and Procedures for Civil Cases, the Electronic Case Filing Rules & Instructions for the Southern District of New York, Section 6, and Standing Order 19-MC-00583, Defendants respectfully seek leave to file Defendants' Brief in Support of Their Motion to Exclude Expert Testimony of William Purcell and Exhibit D to the Declaration of Amy Hefley in Support under seal or in redacted form. Defendants' brief in support of their motion and Exhibit D contain references to and attach excerpts of deposition testimony that was designated "Confidential" by Plaintiffs. Defendants, however, have no interest in confidential treatment for any portion of the brief or exhibit. Therefore, pursuant to Rule I.D., Plaintiffs bear the burden of persuasion with respect to confidential treatment, and Defendants stand ready to file full, unredacted copies of these exhibits via ECF if so ordered.¹

Respectfully submitted,

/s/ David D. Sterling

David D. Sterling

Cc: All counsel of record (via ECF)

¹ Defendants also attach hereto an Appendix identifying all Parties and Attorneys of Record who should have access to the sealed documents.

BAKER BOTTS LLP

Hon. Lorna G. Schofield

- 2 -

December 13, 2021

APPENDIX

Parties:

1. ALSAR Ltd. Partnership
2. Iron Workers Local 40, 361, & 417 – Union Security Funds
3. Iron Workers Local 580 – Joint Funds
4. Chicago Bridge & Iron Company N.V.
5. Philip Asherman
6. Westley Stockton
7. Ronald Ballschmiede

Attorneys:

1. Kim E. Miller
2. Craig J. Geraci, Jr.
3. J. Ryan Lopatka
4. Matthew Woodard
5. Melissa Harris
6. Morgan Embleton
7. Jeremy Lieberman
8. Joshua B. Silverman
9. Patrick Dahlstrom
10. Louis Ludwig
11. Omar Jafri
12. Brian C. Kerr
13. David Sterling
14. Amy Pharr Hefley
15. Sarah Coble