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December 28, 2021

The Honorable Lorna G. Schofield United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

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In re Chicago Bridge & Iron Company N.V. Securities Litigation; Case No. 1:17-Re: CV-1580 (LGS), in the United States District Court for the Southern District of New York

Dear Judge Schofield:

In accordance with Your Honor's December 21, 2021 Order (ECF No. 412) directing Defendants to file a response to Plaintiffs' December 20, 2021 letter motion to file their Memorandum in Opposition to Defendants' Motion in Limine Number 6 and Exhibit B to the Declaration in Support under seal or in redacted form (ECF No. 385), Defendants Chicago Bridge & Iron Company N.V., Philip Asherman, Westley S. Stockton, and Ronald Ballschmiede write to inform Plaintiffs and the Court that they maintain no interest in the confidential treatment of any such deposition testimony previously designated "Confidential." Accordingly, upon Order of the Court, Defendants invite Plaintiffs to file full, unredacted copies of the aforementioned documents via ECF.

Respectfully submitted,

MM Pham Hally Amy Pharr Hefley

All Counsel of Record (via ECF) Cc:

Plaintiffs' motion to seal at Docket No. 385 is **DENIED**. By **January 5, 2022**, Plaintiffs shall file full, unredacted copies of the documents previously filed under seal. The Clerk of Court is respectfully directed to close the motion at Docket No. 385.

Dated: December 29, 2021 New York, New York

United States District Judge