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## December 9, 2019

VIA ECF

Honorable Katherine Polk Failla United States District Judge Southern District of New York 40 Foley Square, Room 2103 New York, NY 10007

## Re: Abraham v. Leigh, et al; No. 1:17-cv-05429 Letter Motion to Request Permission to File Under Seal

Dear Judge Failla:

As the Court is aware, we represent Defendant Abby Leigh, as Executrix of the Estate of Mitch Leigh, in the above-referenced action. We intend to file with the Court a response to the letter filed under seal on December 8, 2019, by Plaintiff Robyn Abraham.

Because the confidentiality asserted belongs to Plaintiff, and because the Court authorized the filing of such material under seal, we are not submitting a confidentiality Declaration or citation to case law supporting the filing under seal. The Executrix does not oppose the seal, however, as the bulk of Plaintiff's letter involves immaterial facts and personal attacks against the Executrix and her counsel, and thus should remain sealed for that reason independent of any confidentiality Plaintiff may assert.

Accordingly, we respectfully request permission to file the response letter under seal, and we thank the Court for its attention to these matters.

Sincerely,

COZEN O'CONNOR

/s/ Michael J. Broadbent

BY: MICHAEL J. BROADBENT

CC: All counsel of record via ECF

Application GRANTED.

Dated: December 9, 2019 New York, New York SO ORDERED.

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HON. KATHERINE POLK FAILLA UNITED STATES DISTRICT JUDGE

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