



March 25, 2020

VIA ECF

Michael J. Broadbent

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

MEMO ENDORSED

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 are filing today the Executrix's Reply Memorandum in Further Support of Her Motion for Summary Judgment ("Reply"), together with its supporting documents. The Reply includes information drawn from documents marked as confidential by other parties. The Executrix requests permission to file such information behind redactions and under seal. Because the confidentiality asserted belongs to other parties, we are not submitting a confidentiality Declaration or citation to case law supporting the redactions and filing under seal.

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

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Application GRANTED.

Dated: March 25, 2020
New York, New York

SO ORDERED.

A handwritten signature in blue ink that reads "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE