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November 20, 2020

VIA ECF

The Honorable Sarah Cave
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: **Coventry Capital v. EEA Life Settlements Inc., No. 17-cv-07417**

Dear Judge Cave:

We represent Defendant EEA Life Settlements, Inc. (“EEA Inc.”) in the above referenced matter. EEA Inc. writes to request that the Court seal Exhibits 1, 3, and 4 submitted with EEA’s Inc.’s November 20, 2020 Letter (Dkt. No. 251), pursuant to Rule I(G)(2) of Your Honor’s Individual Rules of Practice, standing order 19-mc-583, and Section 6 of the Court’s ECF Rules and Instructions. EEA Inc. files with this letter Exhibits 1 and 4 via ECF. In accordance with Rule 1(B) of Your Honor’s Emergency Individual Rules and Practices in Light of COVID-19, EEA Inc. will file Exhibit 3 under seal in hard copy because it is unable to submit the exhibit via ECF due to the format and size of the excel, which makes conversion to pdf virtually impossible.

EEA Inc. also requests that the Court seal Exhibits 3-6, 8-12, 14-16, 21-22, 25 and 28-30 submitted with Coventry Capital US LLC’s November 13, 2020 Letter (Dkt. No. 244). EEA Inc. understands that ViaSource Funding Group, LLC has indicated that it has no objection to their documents being filed publicly (Exs. 7 and 13) and therefore does not request sealing of those exhibits.

EEA Inc. makes this sealing request to protect confidential, commercially sensitive, and/or trade secret material. These exhibits have been designated as “Confidential” or “Highly Confidential/AEO” under the governing Amended Protective Order (Dkt. No. 225), and therefore cannot be filed publicly without being in violation of the Amended Protective Order. Thus, it requests that the Court permit the filing of these documents under seal.

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Respectfully submitted,



Karl Geercken

Attachments

cc: Counsel of Record (via ECF)

Defendant's Letter-Motion at ECF No. 251 to file exhibits under seal is GRANTED. Accordingly, the following documents shall remain under seal and only visible to the selected parties:

- Exhibits 1, 3, and 4 to ECF No. 252 (filed at ECF Nos. 252-1; 252-2; and 252-3)
- Exhibits 3-6, 8-12, 14-16, 21-22, 25 and 28-30 to ECF No. 244.

The Court requests that Defendant EEA Life Settlements, Inc. provide a courtesy copy of Exhibit 3 to its November 20, 2020 letter (filed at ECF No. 252) to both the Court and all other parties.

The Clerk of Court is respectfully directed to limit access to the above-listed exhibits to only the case participants and the Court, and to close the Letter Motion at ECF No. 251.

SO-ORDERED 11/23/2020



SARAH L. CAVE
United States Magistrate Judge