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Jackson Lewis P.C.
300 S. Fourth Street, Suite 900
Las Vegas, Nevada 89101
Tel 702 921-2460
Fax 702 921-2461
www.jacksonlewis.com

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MEMO ENDORSED

MY DIRECT DIAL IS: (702) 921-2486
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May 21, 2020

VIA ECF

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

Re: Johnston v. Electrum Partners, LLC et al.
Case No. 1:17-cv-7823 (KPF)

Dear Judge Failla:

We represent Defendants Electrum Partners, LLC (“Electrum”) and Leslie Bocskor (“Bocskor”) in the above-referenced matter. We write to request permission to redact certain information contained within Jackson Lewis P.C.’s (“Jackson Lewis” or the “Firm”) Motion to Withdraw as counsel of record for Defendants and accompanying Declaration of Joshua A. Sliker, and submit an unredacted copy of the Motion and Declaration for review *in camera*.

Counsel is bound by the attorney-client privilege and the duty of confidentiality set forth in Rule 1.6 of the New York Rules of Professional Conduct. Specifically, Rule 1.6(a) states that “confidential information” includes information gained during or relating to the representation of a client that is “(b) likely to be embarrassing or detrimental to the client if disclosed.” Redaction of certain portions of the motion and declaration is necessary because they contain sensitive and confidential information regarding the reasons that Jackson Lewis seeks to withdraw as counsel of record. Given that the underlying arbitration proceedings remain ongoing, the redacted information in the motion and declaration is likely to be embarrassing and detrimental to Defendants, and may operate to prejudice Defendants.

Hon. Katherine Polk Failla

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Based on the foregoing, Jackson Lewis requests that the Court grant this letter motion as follows:

1. Jackson Lewis shall file a redacted version of its motion to withdraw and declaration in accordance with Rule 9(B) of Your Honor's Individual Rules, and shall serve the same on Defendants and all other counsel.
2. Jackson Lewis shall provide an unredacted version of its motion to withdraw and declaration to the Court for *in camera* review in accordance with Rule 9(B) of the Your Honor's Individual Rules.

Very truly yours,

JACKSON LEWIS P.C.

Joshua A. Sliker

John A. Snyder

cc: John T. Brennan, Esq. (via ECF)

4821-6162-0412, v. 1

Application GRANTED. The Clerk of Court is directed to maintain Dkt. #49 and 50 with viewing privileged granted only to Joshua Alan Sliker, counsel for defendants, and the Court. Docket #47 and 48 shall remain on the docket in redacted form.

Dated: May 26, 2020
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE