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October 26, 2021

VIA ECF

The Honorable Paul G. Gardephe United States District Judge Thurgood Marshall United States Courthouse 40 Foley Square New York, New York 10007

Re: EIG Energy Fund XIV, L.P., et al. v. Keppel Offshore & Marine Ltd.,

No. 18-cv-01047 (PGG)

Dear Judge Gardephe:

We represent Plaintiffs EIG Energy Fund XIV, L.P., *et al.* in the above-captioned matter and submit this letter on behalf of both parties regarding the schedule for filing the parties' summary judgment papers. Per the Court's Orders dated August 23, 2021 (Dkt. No. 89) and September 16, 2021 (Dkt. No. 93), the parties mutually exchanged motions for summary judgment on September 20 and opposition papers on October 19. The parties jointly seek the Court's permission to file their respective summary judgment motions, along with any necessary motions to seal, on November 9, 2021, after the reply papers are served as scheduled on November 2 pursuant to the Court's order.

The parties seek until November 9 to file their respective motion papers in order to allow time to meet and confer concerning redactions in their respective papers so that the parties can consider the scope of motions to file under seal. The parties also have relied on material produced by a third party, who produced such materials with confidentiality designations. The extension would therefore also allow the third party to consider the scope of any motion to seal.

Accordingly, the parties request permission to file their respective motions for summary judgment on November 9. Following the November 9 filing, the parties will provide the Court with courtesy hard copies of the papers printed from ECF, as well as the unredacted papers with proposed redactions highlighted accompanying the motion to seal, per the Court's Individual Rules.

Thank you for your attention to this matter.

MEMO ENDORSED

The Application is granted.

SO ORDERED:

Dated: October 28, 2021

The Honorable Paul G. Gardephe October 26, 2021



Respectfully submitted,

/s/ Daniel B. Goldman
Daniel B. Goldman

CC: Attorneys of Record (via ECF)

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