

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
FILED: 9/14/2020

GIVAUDAN SA,

Plaintiff,

v.

CONAGEN INC.,

Defendant.

18-CV-03588 (JGK)

ORAL ARGUMENT
REQUESTED

NOTICE OF DEFENDANT CONAGEN INC.'S MOTION FOR LEAVE TO FILE
UNDER SEAL CERTAIN EXHIBITS TO DECLARATION OF KATHERINE A. HELM
AND REDACT RELEVANT PORTIONS OF OTHER DOCUMENTS

PLEASE TAKE NOTICE that, pursuant to Section VI.A.2 of Your Honor's Individual Rules of Practice, Defendant Conagen Inc., by and through the undersigned counsel, respectfully requests permission for leave to file Exhibit H to the Declaration of Katherine A. Helm, attached, under seal. This document contains the sensitive business information of Plaintiff Givaudan SA, and Givaudan designated this document as confidential under the protective order.

Further, to minimize the amount of material under seal, Defendant also respectfully requests permission to redact those portions of the Memorandum of Law in Support of Conagen Inc.'s Motion for Summary Judgment and other exhibits to the Declaration of Katherine A. Helm that refer to the contents of or quote Exhibit H for the same reason. Specifically, Exhibit A is a deposition transcript of which portions discuss the contents of and quote Exhibit H. Defendant proposes to redact those portions of Exhibit A as well as those portions of its Memorandum of Law quoting and discussing both Exhibits A and H.

*Application granted
Courtesy copies of any materials
redacted upon documents should be
filed with the Court. So ordered for Givaudan
9/14/20*

Dated: September 11, 2020

Respectfully submitted,

By: /s/ Katherine A. Helm

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