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Covington & Burling LLP  
One CityCenter  
850 Tenth Street, NW  
Washington, DC 20001-4956  
T +1 202 662 6000

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MEMO ENDORSED

February 2, 2022

The Honorable Louis L. Stanton  
United States District Court for the Southern District of New York  
500 Pearl Street, Courtroom 21-C  
New York, New York 10007

**Re: *MV Realty, PBC, LLC, v. Innovatus Capital Partners, LLC* (1:18-cv-07142); *Innovatus v. Neuman et. al.* (1:18-cv-04252)**

Dear Judge Stanton:

We write on behalf of MV Realty to respectfully request permission to file under seal portions of MV's February 1, 2022 letter. MV's letter refers to information from documents that have been designated by Innovatus "Confidential" under the Protective Order.

Although there is a presumption in favor of public access to judicial documents, a court may seal judicial documents if "closure is essential to preserve higher values and closure is narrowly tailored to serve that interest." *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 120 (2d Cir. 2006). The Protective Order provides: "Where any Confidential or Highly Confidential Materials, or Information derived therefrom, is included in any motion or other proceeding in this Proceeding, the Parties and any involved non-party shall follow the procedures outlined in Fed. R. Civ. P. 5.2, the Standing Order Regarding Electronic Filing Under Seal in Civil and Miscellaneous Cases dated December 19, 2019, and the Individual Rules of Practice issued by the Court, or any Standing Procedural Order subsequently issued by the Court." On June 1, 2021, the Court entered an Order in connection with Innovatus' request to seal certain portions of MV's May 24, 2021 letter, which provided further guidance regarding the standard for sealing. See Dkt. 171.

Accordingly, MV requests permission to file portions of its February 1, 2022 letter under seal, subject to Innovatus' position as to whether they should be sealed.

Sincerely,

s/ Jason C. Raofield  
Jason C. Raofield

Denied.  
Louis L. Stanton  
2/14/22



Cira Centre  
2929 Arch Street  
Philadelphia, PA 19104-2808  
+1 215 994 4000 Main  
+1 215 994 2222 Fax  
www.dechert.com

February 9, 2022

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**MICHAEL H. MCGINLEY**

michael.mcginley@dechert.com  
+1 215 994 2463 Direct  
+1 215 655 2131 Fax

**VIA ECF**

The Honorable Louis L. Stanton  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United State Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *Innovatus Capital Partners, LLC v. Neuman*, No. 1:18-cv-04252-LLS (S.D.N.Y.)<sup>1</sup> and  
*MV Realty PBC, LLC v. Innovatus Capital Partners, LLC*, No. 1:18-cv-07142-LLS  
(S.D.N.Y.)

Dear Judge Stanton:

We write on behalf of Innovatus Capital Partners, LLC (“Innovatus”) in response to the MV Realty Parties’ letter request (Dkt. 283) to seal portions of their February 1, 2022 letter to the Court (the “Letter”) (Dkt. 284).

Innovatus has reviewed the portions of the Letter proposed to be redacted by the MV Realty Parties and Innovatus does not seek sealed treatment of this information.

Respectfully,

A handwritten signature in black ink, appearing to read "Mi McGinley", written in a cursive style.

Michael H. McGinley

CC: All counsel of record (via ECF)

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<sup>1</sup> All citations to “Dkt.” herein refer to the docket entries in *Innovatus Capital Partners, LLC v. Neuman*, No. 1:18-cv-04252-LLS (S.D.N.Y.).