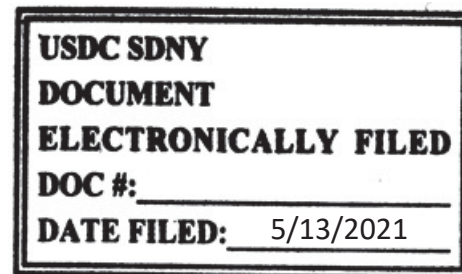


BARNES & THORNBURG LLP

J.T. Larson
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Motion to seal GRANTED. SO ORDERED.

Dated: May 13, 2021

A handwritten signature in blue ink, appearing to be "Att C A".

May 6, 2021

Via Electronic Court Filing

Honorable Stewart D. Aaron, U.S.M.J.
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *Letter Motion to Seal Exhibit A to DePuy's Opposition to Plaintiffs' Request to Modify Scheduling Order and Reopen Expert Discovery [ECF No. 300]* 18-CV-04814

Dear Judge Aaron:

DePuy Orthopaedics, Inc. ("DePuy") (now known as Medical Device Business Services, Inc.), pursuant to this Court's local rules and Your Honor's individual rules of practice, respectfully requests that the Court seal from public view certain portions of the Disqualified Expert's original report. DePuy has filed a proposed redacted version of this document as Exhibit A to *DePuy's Opposition to Plaintiffs' Request to Modify Scheduling Order and Reopen Expert Discovery* [ECF No. 300-1.] Allowing redactions to this document comports with this Court's prior orders regarding the Disqualified Expert. [See ECF No. 195 (Order Granting Letter Motion to Seal).] For simplicity, DePuy has copied *verbatim* Howmedica Osteonics Corporation's redactions to this same document, which the Court has already deemed appropriate to protect from disclosure the identity of the Disqualified Expert. [See ECF No. 215-3, pp. 3-62.] Therefore, DePuy requests that the Court accept the redacted version of the Disqualified Expert's original report and continue to protect the Disqualified Expert's identity from public disclosure.

Very truly yours,

/s/ J.T. Larson

J.T. Larson