



Ryan G. Pitman | Partner
Direct 716.844.3454 | rpitman@goldbergsegalla.com

October 12, 2020

BY ECF

Honorable John G. Koeltl
United States District Court for the Southern District of New York
Daniel P. Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Givaudan SA v. Conagen Inc.*
No. 1:18-cv-06172

Dear Judge Koeltl:

We represent Givaudan SA (“Givaudan”) in the above matter. By this letter, Givaudan moves for permission to file its reply memorandum in relation to its summary judgment motion under partial seal. The information Givaudan seeks to file under seal concerns (1) Plaintiffs’ identification of purported trade secret information; (2) Plaintiffs’ damages theories, which they designated confidential; and (3) information concerning Givaudan’s confidential collaboration with a third party partner to develop certain technology.

Givaudan will of course be happy to provide any further information should the Court require it. Thank you for your attention to this matter.

Respectfully submitted,

/s/ Ryan G. Pitman

Ryan G. Pitman

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#
DATE FILED: 10/13/2020

APPLICATION GRANTED
SO ORDERED

John G. Koeltl
John G. Koeltl, U.S.D.J.

10/13/20