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March 18, 2022

APPLICATION GRANTED
SO ORDERED *Vernon S. Broderick*
VERNON S. BRODERICK
U.S.D.J. 03/18/22

VIA ECF

Hon. Vernon S. Broderick
 United States District Court
 Southern District of New York
 Thurgood Marshall United States Courthouse
 40 Foley Square, Room 415
 New York, New York 10007

Plaintiff is directed to Rule 5.B. of my Individual Rules & Practices in Civil Cases and to meet and confer with Defendants as necessary to determine if the written responses can be filed in redacted form on ECF.

Re: Re: *Spectrum Dynamics Medical Limited v. GE*; Case No.: 18-cv-11386 (VSB)

Dear Judge Broderick:

We represent Plaintiff Spectrum Dynamics Medical Limited (“Plaintiff” or “Spectrum”) in the above-referenced action. On behalf of Plaintiff, we write pursuant to Rule 5.B. of your Honor’s Individual Practices in Civil Cases to respectfully request permission to file under seal Plaintiff’s written responses to the questions posed in Your Honor’s March 9, 2022 Order (Doc. 417), and accompanying Appendices 1-6 filed today, March 18, 2022.

Plaintiff requests permission to file the written responses and Appendices 1-6 thereto under seal because the documents contain information designated as “Highly Confidential – Attorneys’ Eyes Only” by the respective parties under the Stipulated Confidentiality and Protective Order (Doc. 156).

Respectfully submitted,

/Neil F. Greenblum/

Neil F. Greenblum

cc: All counsel of record (via ECF)
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