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LICENSED IN PENNSYLVANIA & NEW JERSEY

Application *Granted,*

June 18, 2021

So Ordered:


Hon. P. Kevin Castel, U.S.D.J.

6-22-21

The Hon. P. Kevin Castel, U.S.D.J.
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *In re Arida, LLC, No. 19 Misc. 522 (PKC) Discovery Dispute*

Dear Judge Castel:

We write on behalf of 28 U.S.C. §1782 Applicants in the above-captioned matter, with the consent of Respondents, pursuant to Federal Rule of Civil Procedure 37(a)(3)(B) and Local Civil Rule 37.2, regarding a discovery dispute over Respondents' requested Protective Order. No conference is pending in this matter.

On January 19, 2021, Respondents served their Objections to Applicants' subpoenas, withholding responsive materials and testimony based on a number of different objections, including lack of a Protective Order to protect their confidential and sensitive information, and offered a proposed Protective Order. Applicants agreed in principle with Respondents' request for an order for protection of qualifying confidential information, but did not agree with some of the requested provisions in the proposed order. The parties conferred in good faith on the phone on February 25, March 5, April 6 and June 11, 2021, and exchanged numerous email communications. The parties were able to resolve some disagreements, but not all of them, and have been unable to agree on a stipulated Protective Order.

The parties respectfully ask permission to simultaneously submit separate letters, limited to 10 pages in length, presenting their respective proposed Protective Orders, a joint chart of the disputed issues, and any supporting affidavits on Russian law by **June 25, 2021**. Because many Respondents' counsel will be out of the office beginning on June 26, the week prior to the July 4 holiday, and only returning on July 6, the parties agreed to provide their responses to each other's letters on **July 15, 2021**.

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The parties believe that this procedure will provide for a streamlined presentation of issues and assist the Court in determining the remaining disputes. The parties thank the Court for its consideration of this dispute.

Respectfully,

Anna V. Brown, Esq.
Timur Zubaydullin, Esq.

All counsel of record via ECF.