

**BERNSTEIN LITOWITZ BERGER  
& GROSSMANN LLP**  
1251 Avenue of the Americas  
New York, NY 10020

**KAPLAN FOX & KILSHEIMER LLP**  
850 Third Avenue, 14th Floor  
New York, NY 10022

April 26, 2021

**VIA ECF**

The Honorable Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2103  
New York, NY 10007

**MEMO ENDORSED**

Re: *Arkansas Teacher Retirement System v. Allianz Global Investors U.S. LLC, et al.*,  
No. 20-cv-5615-KPF

Dear Judge Failla:

Pursuant to Rule 9 of Your Honor's Individual Practices and Section IX of the Stipulated Amended Protective Order entered in the Related Actions<sup>1</sup> by the Court on April 21, 2021 ("Protective Order") (ECF No. 90), Plaintiff Arkansas Teacher Retirement System ("Plaintiff") requests permission to file the documents attached as Exhibits 1, 2 and 4-7 ("Sealed Exhibits") to the Declaration of Michael Blatchley in Opposition to Defendant Allianz Global Investors U.S. LLC's Omnibus Motion to Dismiss, under seal in their entirety. Additionally, Plaintiff requests permission to redact references to the Sealed Exhibits in Plaintiffs' Joint Response in Opposition to Defendant Allianz Global Investors U.S. LLC's Omnibus Motion to Dismiss ("Plaintiffs' Opposition"). The Sealed Exhibits and redacted portions of Plaintiffs' Opposition have been designated as "Confidential" by Defendant Allianz Global Investors U.S. LLC ("Allianz") under the Protective Order. In accordance with Rule 9(B) of Your Honor's Individual Practices, we will file under seal unredacted copies of the Sealed Exhibits and Plaintiffs' Opposition as well as a copy highlighting the information that has been redacted from Plaintiffs' Opposition.

Plaintiff does not concede that the materials designated as confidential by Allianz are confidential.

Respectfully,

/s/ Michael Blatchley

James A. Harrod

Michael Blatchley

BERNSTEIN LITOWITZ BERGER  
& GROSSMANN LLP

/s/ Frederic S. Fox<sup>2</sup>

Frederic S. Fox

Donald R. Hall

KAPLAN FOX & KILSHEIMER  
LLP

<sup>1</sup> The Related Actions are the twelve captioned cases as defined in Civil Management Plan #1 entered by the Court on December 7, 2020 (ECF No. 65).

<sup>2</sup> Counsel's electronic signature ("/s/") is signed with consent pursuant to Rule 8.5 of this Court's Electronic Case Filing Rules & Instructions as of February 1, 2021.

Application GRANTED. Exhibits 1, 2, and 4-7 to the Declaration of Michael Blatchley in Opposition to Defendant's Omnibus Motion to Dismiss may be filed under seal, visible only to the Court and the parties. Additionally, Plaintiff may redact references to these exhibits in its memorandum of law.

Dated: April 27, 2021  
New York, New York

SO ORDERED.

A handwritten signature in blue ink that reads "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE