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May 5, 2022

**MEMO ENDORSED**

**VIA ECF**

The Honorable Katherine Polk Failla, USDJ  
United States District Court for the Southern District of New York  
40 Foley Square, New York, New York 10007

Re: *Blue Cross & Blue Shield Assoc. Nat'l Emp. Benefits Committee v. Allianz Global Investors U.S. LLC et al., 20-cv-7606 (KPF)*

Dear Judge Failla:

In connection with the pre-conference letter filed on May 3, 2022 by Defendant Aon Investments USA Inc. ("Aon") regarding the discovery dispute concerning Plaintiff Blue Cross and Blue Shield Association National Employee Benefits Committee's ("NEBC") refusal to comply with the Court's Order (Dkt. 140) requiring it to apply specified search terms to the files of ten priority custodians, Aon respectfully requests leave to file revised redacted versions of the pre-conference letter and Exhibits 4 and 10 to that letter on the public docket, and that the Court instruct the clerk to remove the previously-filed versions (*see* Dkts. 167, 167-4, 167-10) from the public docket.

Following Aon's May 3, 2022 filing, NEBC requested that Aon make additional redactions to the pre-motion letter and Exhibits 4 and 10 to protect additional material that NEBC contends contains "Protected Material" under the Stipulated Amended Protective Order. (Dkt. 79). Aon agreed to comply with NEBC's request.

Respectfully submitted,

/s/ Julia M. Beskin

Julia M. Beskin

cc: Counsel for Plaintiff (by ECF)

**quinn emanuel urquhart & sullivan, llp**

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Application GRANTED. Defendant shall be permitted to file revised redacted versions of its May 3, 2022 pre-conference letter and associated exhibits. The Clerk of Court is hereby directed to strike the documents located at docket entry 167, and Defendant is directed to refile the public version of its revised premotion submission as soon as practicable.

The Clerk of Court is directed to terminate the pending motion at docket entry 171.

Dated: May 6, 2022  
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