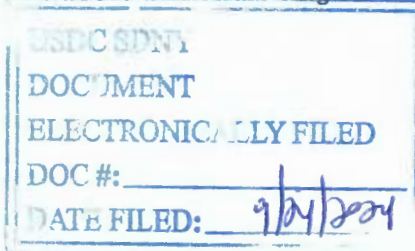


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



VALLAIR SOLUTIONS, SARL,

*Plaintiff and Counterclaim
Defendant,*

v.

321 PRECISION CONVERSIONS, LLC,

*Defendant and Counterclaim
Plaintiff.*

NO. 1:21-cv-07507-CM-RWL

JUDGE COLLEEN MCMAHON

**DEFENDANT 321 PRECISION
CONVERSIONS, LLC AND PLAINTIFF
VALLAIR SOLUTION SARL'S JOINT
MOTION TO SEAL OR REDACT**

Defendant 321 Precision Conversions, LLC ("Precision"), with the consent and agreement of Plaintiff Vallair Solution SARL ("Vallair"), respectfully moves this Court for leave to file certain documents under seal or in redacted form, to protect Confidential Information as contemplated in the parties' Confidentiality Agreement and Stipulated Protective Order (Doc. 37), including documents previously designated by a party as "Confidential" or "Confidential Attorneys' Eyes Only." A memorandum of law is jointly submitted by both parties in support of this motion.

MEMO ENDORSED

Dated: April 29, 2024

Respectfully submitted,

/s/ Chelsea Mikula

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9/24/2024
This motion is granted temporarily, and nunc pro tunc to April 30, 2024, so that the parties may file certain redacted documents NOT sealed, but redacted pendente lite. Hard copies with no redactions must be delivered to chambers immediately. When a decision is reached on the underlying motion the parties will have 10 days to explain why anything in that decision should remain "Confidential".

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*Attorneys for Defendant 321 Precision
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Consented and agreed to on this 29th day of
April, 2024, by:

*By: /s/ Evan Kwarta with express
permission*

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and

THE AXELROD FIRM, PC
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PROOF OF SERVICE

A copy of the foregoing was served on April 29, 2024 by sending it by electronic means to the email addresses provided by the parties as follows:

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Attorneys for Plaintiff Vallair Solutions SARL

Dated: April 29, 2024

Respectfully submitted,

/s/ Chelsea Mikula

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*One of the Attorneys for Defendant 321 Precision
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