

# Arnold & Porter

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January 31, 2024

**VIA ECF**

Hon. Denise L. Cote  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1910  
New York, NY 10007

**Re: *American GreenFuels Rockwood (Tennessee), LLC v. Aik Chuan Construction PTE, Ltd.* (Case No. 1:21-cv-07680)**

Dear Judge Cote:

We write respectfully on behalf of Aik Chuan Construction PTE, Ltd. (“Aik Chuan”) pursuant to Section 8 of Your Honor’s Individual Practices in Civil Cases to request permission to file under seal Exhibit 3 that is being submitted in connection with Aik Chuan’s memorandum in opposition to the Cross-Motion filed by American GreenFuels Rockwood (Tennessee), LLC and Kolmar Americas, Inc. (collectively, “Kolmar”). Attached hereto is a redacted copy of Exhibit 3. Contemporaneously with the filing of this letter, Aik Chuan will file under seal an unredacted copy of Exhibit 3.

Aik Chuan respectfully submits this letter because Exhibit 3 to Aik Chuan’s opposition brief is a deposition transcript, portions of which Kolmar has maintained are Highly Confidential – Attorneys’ Eyes Only pursuant to the confidentiality order entered by the Court. *See* Dkt. 66. The Court previously granted Aik Chuan’s prior request to seal the same deposition transcript based on Kolmar’s designation of those portions as Highly Confidential – Attorneys’ Eyes Only. *See* Dkt. 82.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ John F. Hagan Jr  
John F. Hagan Jr

Granted.  
Denise Cote  
2/5/24

cc: Counsel of record (via ECF)