



RENAKER SCOTT

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November 8, 2023

Via ECF

Judge Colleen McMahon Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007-1312

Re: Disberry v. Employee Relations Committee, et al. Case No. 22-Civ-5778 (CM)

Dear Judge McMahon,

Pursuant to the Southern District of New York Electronic Case Filing Rules & Instructions (Section 6: Filing Under Seal and Redacting in Civil and Miscellaneous Cases), Plaintiff files this Letter Motion to Seal documents attached to the Declaration of Kirsten Scott in Support of Plaintiff's Motion for Summary Judgment ("Scott Dec."), which will be filed shortly. Specifically, this Letter Motion pertains to the following exhibits attached to the Scott Dec. and filed under seal:

- (1) Exhibit 1 (EBC_000253-272)
(2) Exhibit 5 (EBC_003407-10)
(3) Exhibit 6 (EBC_003411)
(4) Exhibit 8 (ALIGHT001681-96)
(5) Exhibit 9 (ALIGHT001697-1706)
(6) Exhibit 10 (ALIGHT001387-1406)
(7) Exhibit 12 (EBC_000766-820)
(8) Exhibit 15 (ALIGHT001153-1213)
(9) Exhibit 16 (ALIGHT001117-52)
(10) Exhibit 17 (ALIGHT002126-27)
(11) Exhibit 18 (EBC_001537-1706)
(12) Exhibit 21 (ALIGHT001239-41)
(13) Exhibit 24 (ALIGHT002126-27)
(14) Exhibit 25 (ALIGHT002341-2350)
(15) Exhibit 31 (EBC_001388-1391)
(16) Exhibit 33 (ALIGHT002949-2952)
(17) Exhibit 34 (ALIGHT003177-78)
(18) Exhibit 35 (ALIGHT002688-2702)

Handwritten notes: 11/9/2023, You may file these documents under seal and redact relevant portions of the moving papers. You MUST provide me with hard copies of these documents and a hand copy of...

Handwritten notes: UNREDACTED as sent marked

Each of the documents with the “EBC” Bates number prefix was produced in this case by Defendant Employee Relations Committee of the Colgate-Palmolive Company (the “Committee”), and stamped confidential by the Committee. Each of the documents with the “ALIGHT” Bates number prefix was produced in this case by Defendant Alight Solutions LLC (“Alight”) and stamped “confidential” by Alight. Plaintiff is filing these documents under seal pursuant to the Committee and Alight’s marking of these documents as confidential, pursuant to the Protective Order in this case (ECF 86). Pursuant to Your Honor’s Individual Practices and Procedures (Sections I(A) and V), Plaintiff is filing these documents under seal electronically on CM/ECF. However, Plaintiff does not take the position that any of these documents need to be restricted from the public record.

Sincerely,

RENAKER SCOTT LLP

By:



Kirsten Scott

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