

## KASOWITZ BENSON TORRES LLP

1633 BROADWAY  
NEW YORK, NEW YORK 10019  
(212) 506-1700  
FAX: (212) 506-1800

MARC E. KASOWITZ  
DIRECT DIAL: 212-506-1710  
DIRECT FAX: 212-835-5010  
MKASOWITZ@KASOWITZ.COM

ATLANTA  
HOUSTON  
LOS ANGELES  
MIAMI  
NEWARK  
SAN FRANCISCO  
SILICON VALLEY  
WASHINGTON DC

February 5, 2024

**VIA ECF**

Hon. Lorna G. Schofield  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: ***Binh Thanh Import Export Prod. & Trade Joint Stock Co. v. Amazon.com Servs. LLC,***  
**No. 1:23-cv-00292-LGS – Letter Motion to File Under Seal**

Your Honor:

On behalf of plaintiff Binh Thanh Import Export Production & Trade Joint Stock Co. (“Gilimex”) in the above action, and pursuant to the Court’s February 2, 2024 Order (Dkt. 80) granting Gilimex leave to amend its complaint, and February 5, 2024 Order (Dkt. 81) approving defendant Amazon.com Services LLC’s (“Amazon”) proposed redactions and ordering the sealing of the proposed First Amended Complaint (Dkts. 57, 58), we respectfully move the Court to treat as sealed the unredacted version of Gilimex’s First Amended Complaint. Gilimex has also filed a redacted version of the First Amended Complaint, consistent with redactions proposed by Amazon in its November 13, 2023 letter to the Court (Dkt. 61).

The First Amended Complaint references certain information provided by Amazon during discovery that has been designated by Amazon as CONFIDENTIAL or CONFIDENTIAL-ATTORNEY’S EYES ONLY pursuant to the February 21, 2023 Stipulation and Confidentiality Order (Dkt. 25). Given the confidentiality designations and the Court’s February 5, 2024 order, Gilimex has filed the unredacted First Amended Complaint under seal.

Respectfully,

/s/ Marc E. Kasowitz

cc: All Counsel of Record

KASOWITZ BENSON TORRES LLP

Hon. Lorna G. Schofield  
February 5, 2024  
Page 2 of 2

Appendix

Pursuant to Your Honor's Individual Rule I.D.3, included below is a list of all parties and attorneys of record who should have access to the sealed documents:

KASOWITZ BENSON TORRES LLP

Marc E. Kasowitz  
Edward E. Filusch  
Victor J. Brienza  
1633 Broadway  
New York, New York 10019

*Attorneys for Plaintiff Binh Thanh Import  
Export Production & Trade Joint Stock Co.*

PERKINS COIE LLP

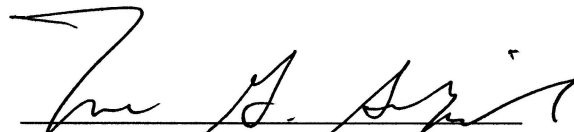
Alan B. Howard  
Adam R. Mandelsberg  
Margaret W. Meyers  
Evelyn Y. Pang  
1155 Avenue of the Americas  
22<sup>nd</sup> Floor  
New York, New York 10036

*Attorneys for Defendant Amazon.com  
Services LLC*

Application GRANTED. The redacted information in the Amended Complaint is the same information that the Court previously allowed be filed in redacted form, with unredacted versions filed under seal, in the Order at Dkt. 81.

The Clerk of Court is respectfully directed to maintain Dkt. 83 under seal and to close the motion at Dkt. 82.

Dated: February 6, 2024  
New York, New York

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE