

SPIVAKLIPTONLLP

ATTORNEYS AT LAW

Hope Pordy
hpordy@spivaklipton.com
1040 Avenue of the Americas, 20th Floor
New York, NY 10018
T 212.765.2100
F 212.765.8954
spivaklipton.com

February 5, 2024

VIA ECF

Hon. Jesse M. Furman
United States District Court
Southern District of New York
40 Centre Street, Room 2202
New York, NY 10007

Re: *International Alliance of Theatrical Stage Employees (I.A.T.S.E.), et al v. That's Amore Movie, LLC*, Case No. 23-cv-10731 (JMF)

Dear Judge Furman:

I represent the Plaintiffs – International Alliance of Theatrical Stage Employees (I.A.T.S.E.), Local 600, International Cinematographers Guild, Local 700, Motion Picture Editors Guild, Local 161, Script Supervisors, Production Coordinators, and Accountants, Local 798, Make-Up Artists and Hair Stylists, Local 764, Theatrical Wardrobe Union, Local 52, Motion Picture Studio Mechanics, and United Scenic Artists, Local USA 829 (“collectively referred to herein as “Plaintiffs”) – in the above-referenced lawsuit brought against That’s Amore Movie, LLC (“Defendant” or “That’s Amore”).

On or about January 30, 2024, Your Honor granted Defendant’s Letter Motion to Seal Certain Limited Portions of its Opposition to Plaintiffs’ Petition to Confirm Arbitration Award and Application for Attorneys Fees and Costs [ECF Dkt. Nos. 20 and 23]. On or about December 20, 2023, Your Honor granted Plaintiffs’ Letter Motion to Seal the parties’ Mutual General Release and Settlement Agreement (“Settlement Agreement”), which was fully executed by the parties on August 18, 2023 (“Sealing Order”) [ECF Dkt. Nos. 6 and 10].

Pursuant to the January 30, 2024 Order, the Sealing Order, and Your Honor’s Individual Rule of Practice 7, Plaintiffs request leave to file under seal certain limited portions of its Reply to Defendant’s Opposition to Plaintiffs Petition to Confirm Arbitration Award and Application for Attorneys Fees and Costs and accompanying papers. Plaintiffs seek to quote directly from portions of the Settlement Agreement in support of their Reply and request the Court’s permission to file it under seal given the confidentiality clause contained therein and the Court’s prior Sealing Order.

