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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.

Hon. Jesse M. Furman Page 2

Accordingly, Plaintiffs respectfully request that they be permitted to file certain limited portions of their Reply Memorandum of Law, and accompanying papers, under seal in compliance with the confidentiality terms of the Settlement Agreement and consistent with Defendant's request [ECF Dkt. Nos. 20 and 23], and for the reasons stated in Plaintiffs' initial Letter Motion to Seal [ECF Dkt. Nos. 6 and 10].

A proposed order is attached.

Respectfully submitted,

SPIVAK LIPTON LLP

Attorneys for 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, United Scenic Artists,
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By: /s/
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Attorneys for Defendant That's Amore Movie, LLC The motion to seal is granted temporarily. The Court will assess whether to keep the documents at issue sealed or redacted when resolving the underlying dispute. The Clerk of Court is directed to terminate ECF No. 26.

SO ORDERED.

February 6, 2024