



March 7, 2025

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MEMO ENDORSED

Via ECF

The Honorable Katherine Polk Failla
United States District Court for the Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

**Re: Chenming Holdings (Hong Kong) Limited v. Sklarov et al. (1:24CV00935) –
Letter Motion to Seal**

Dear Judge Failla:

This firm represents defendants Sierra Universal Corp (“SUC”), UPC Holdings Ltd (“UPCH”), Lviv Estate Holdings Ltd (“Lviv”), and C Vanderbilt Management Ltd. (“CVM”) (collectively, the “Servicer Defendants”).

Pursuant to Your Honor’s Individual Rule 9(B), the Servicer Defendants respectfully request approval to redact portions of their reply memorandum of law (“Reply Brief”) in further support of their Motion to Dismiss (the “Motion”) Plaintiff’s Verified Second Amended Complaint. The Reply Brief quotes directly from four confidential stock loan agreements (collectively, the “Loan Agreements”) between plaintiff Chenming Holdings (Hong Kong) Ltd. and three non-party lenders.

The Servicer Defendants previously requested permission (*see* ECF Dkt. No. 108) to redact portions of their moving brief in support of their Motion that quote directly from the Loan Agreements. Your Honor granted that request. (*See* ECF Dkt. No. 119). For the same reasons described in that initial request, the Servicer Defendants seek leave to redact direct quotations to the Loan Agreements in their Reply Brief.

We have filed this letter publicly on ECF and will also, pursuant to Rule 9.B of Your Honor’s Individual Rules of Practice, submit (i) this letter, (ii) an unredacted version of the Servicer Defendants’ Reply brief, and (iii) a copy of the Reply brief highlighting the information that has been redacted in the public ECF filing.

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We thank the Court for its attention to this matter.

Respectfully Submitted,

By: /s/ Eric Rieder
Eric Rieder

*Attorney for Defendants Sierra Universal
Corp, UPC Holdings Ltd, Lviv Estate
Holdings Ltd, and C Vanderbilt
Management Ltd.*

cc: All parties (via ECF)

Application GRANTED. The Clerk of Court is directed to maintain docket entry 134 under seal, viewable to the Court and the parties only.

The Clerk of Court is further directed to terminate the pending motion at docket entry 133.

Dated: March 10, 2025
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE