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July 25, 2024

VIA ECF

Honorable Paul A. Engelmayer
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Jane Street Group LLC v. Millennium Management LLC*, 24 C 2783 (PAE),
**LETTER MOTION TO SEAL MILLENNIUM'S OPPOSITION TO JANE
STREET'S LETTER MOTION TO COMPEL (D.I. 167)**

Dear Judge Engelmayer:

We represent Defendant Millennium Management LLC ("Millennium") in the above-referenced action. We write to request permission to seal certain materials that potentially contain the parties' confidential, proprietary, commercially sensitive, or trade secret information. Millennium files its Opposition to Jane Street's Letter Motion to Compel (D.I. 167) and seeks to seal its filing consistent with the Court's prior Orders permitting the parties to file documents under seal, including Jane Street's Letter Motion to Compel and Exhibits (*see* D.I. 169) and consistent with the parties' agreement below.

The parties have agreed that if any party is filing any document that might possibly reveal or reflect information that the non-filing party may seek to redact (including information that is protected under the Confidentiality Order), the filing party will initially file the document completely under seal. The parties will then confer on whether any part of the filing should remain under seal, if the filing can be made publicly, or if any redactions are requested. The original filing party agrees to honor all such proposed redactions in the public redacted filing, without prejudice to the right to later dispute any proposed redactions in accordance with the Court's procedures.

Millennium therefore respectfully requests permission to file its Opposition to Jane Street's Motion to Compel under seal, with the parties to confer and file public versions of these documents within three business days.

Respectfully submitted,

/s/ Andrew J. Levander

Andrew J. Levander

GRANTED.

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge

cc: Deborah Brown, Quinn Emanuel, by ECF
Rollo Baker, Elsberg Baker & Maruri, by ECF

Dated: July 26, 2024
New York, New York