



March 11, 2025

VIA CM/ECF

Honorable Mary K. Vyskocil
 Daniel Patrick Moynihan
 United States Courthouse
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Re: Emergency Request to Seal ECF No. 15, *In re Subpoenas to Leeds Equity Partners and Jacques Galante* Misc. No. 1:25-mc-00079 (S.D.N.Y.), Related to *UWorld, LLC fka USMLEWorld, LLC v. USMLE Galaxy, LLC DBA Archer Review and Tart Labs*, No. 3:23-cv-00447 (N.D. Tex.)

Dear Judge Vyskocil:

Pursuant to Rule 7.1(e) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, the Southern District of New York's Sealed Records Filing Instructions, and Rule 9(B) of the Individual Rules of Practice in Civil Cases, *UWorld, LLC, f/k/a USMLEWorld, LLC* ("UWorld") respectfully submits this letter requesting the emergency sealing of ECF No. 15. *UWorld* submits in its place a public letter regarding the sealing of ECF No. 17, 17-1, included as Exhibit A. Alternatively, *UWorld* submits a version of ECF No. 15 redacting the confidential information.

"Although the right of public access to court records is firmly entrenched and well supported by policy and practical considerations, the right is not absolute." *In re Orion Pictures Corp.*, 21 F.3d 24, 27 (2d Cir. 1994). "Redaction may be appropriate to protect confidential information." *Fairstein v. Netflix, Inc.*, No. 20-CV-8042 (PKC), 2023 WL 6164293, at *1 (S.D.N.Y. Sept. 21, 2023).

UWorld seeks to file under seal ECF No. 15. *UWorld* inadvertently revealed the identity of a third party, which is not publicly known, and *Archer Review* must keep confidential. This information is irrelevant to the Court's decision on sealing (and irrelevant to the dispute for which the sealing is requested). The Court in the underlying action, *UWorld, LLC fka USMLEWorld, LLC v. USMLE Galaxy, LLC DBA Archer Review and Tart Labs*, No. 3:23-cv-00447 (N.D. Tex.), has ordered sealing of similar information (See ECF No. 105). Accordingly, *UWorld* respectfully requests that the Court seal ECF No. 15 and allow *UWorld* to file Exhibit A as a replacement thereof.

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Respectfully submitted,

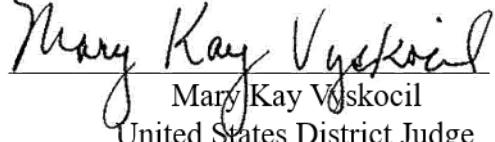
/s/ Sean M. Topping
Sean M. Topping

Partner

GRANTED
ECF 15 SHALL BE SEALED PROVISIONALLY
UNTIL THE RESOLUTION OF PENDING
MOTION AT ECF 1 & 12.

SO ORDERED.

Date: 3/11/2025
New York, New York


Mary Kay Vyskocil
United States District Judge