

 **NORTON ROSE FULBRIGHT**

March 11, 2025

VIA CM/ECF

Honorable Mary K. Vyskocil
Daniel Patrick Moynihan
United States Courthouse
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New York, NY 10007-1312

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Re: Emergency Request to Seal ECF No. 13, *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. 13. UWorld seeks to file under seal ECF No. 13. UWorld inadvertently revealed confidential information concerning the Leeds transaction, which is not publicly known. Counsel for Archer Review and Leeds notified UWorld of the error today, March 11, 2025. UWorld explained the error was inadvertent and now seeks to remedy.

"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). This information is relevant to the Court's decision on the parties' discovery dispute, but UWorld submits it should be sealed for the same reasons all information on the Leeds transaction (other than the fact that the transaction occurred) should be sealed. See ECF Nos. 15, 20-1, 20-2.

Accordingly, UWorld respectfully requests that the Court seal ECF No. 13 and allow UWorld to file Exhibit A as a replacement thereof. UWorld submits in its place a version of ECF No. 13 redacting the confidential information (describing the magnitude of the Leeds transaction). Pursuant to the Court's rules, UWorld also submits a sealed version of ECF No. 13 with the proposed redactions highlighted (Ex. B). A proposed order is further included as Exhibit C.

Respectfully submitted,

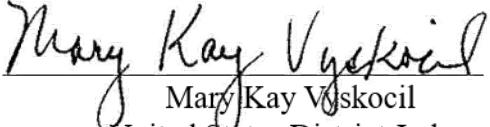
/s/ Sean M. Topping
Sean M. Topping

Partner

GRANTED
SO ORDERED.

The Clerk of Court is respectfully request to close the motion
at ECF No. 22.

Date: 3/12/2025
New York, New York


Mary Kay Vyskocil
United States District Judge