

**COHEN, LaBARBERA & LANDRIGAN, LLP**  
**ATTORNEYS AT LAW**

RONALD J. COHEN (NY BAR & LL.M. IN TAXATION)  
 STEPHEN P. LA BARBERA (NY BAR)  
 THOMAS C. LANDRIGAN (NY & NJ BAR)

PHILLIP C. LANDRIGAN (NY BAR – OF COUNSEL)  
 PAOLA LEICHTER (NY & NJ BAR - OF COUNSEL)  
 OXANA LUKINA (NY BAR)  
 JENNIFER T. MULLEADY (NY BAR)  
 MELISSA A. PERRY (NY BAR)  
 JOSHUA A. SCERBO (NY & NJ BAR)  
 KYLE SEISS (NY & NJ BAR)  
 CHRISTOPHER SMITH, (NY BAR & LL.M IN TAXATION)  
 ANDREW S. WULFMAN (NY BAR – OF COUNSEL)

99 BROOKSIDE AVENUE  
 CHESTER, NY 10918  
 TELEPHONE (845) 291-1900  
 FACSIMILE (845) 291-8601\*

EMAIL: Call for Individual Email Addresses  
 \*Not for Service of Process

SUSAN M. YEOMAN (PARALEGAL SUPERVISOR)

July 9, 2020

*Submitted via ECF:*

Hon. Paul E. Davison, U.S.M.J.  
 United States District Court  
 300 Quarropas St.  
 White Plains, New York 10601

**Re: Elavon, Inc. v. Northeast Advance techs., Inc., et al.; Civil Action No. 7:15-cv-7985**  
**Letter Motion to Seal E-Filed Documents**

Your Honor:

As the Court is aware, our offices represent Defendants Northeast Advance Technologies, Inc., (“Northeast”), Esteban Castillo, Samuel Brach, and Joshua Brach (collectively, the “Northeast Defendants”) in the above referenced matter. We write to request the Court issue an order sealing E-Filed Document Number 345-3, which corresponds with Exhibit C to the Northeast Defendants’ July 3, 2020 Rule 37.2 Letter Motion for a Conference to Compel Discovery by plaintiff in the matter.

After the filing of this letter and its accompanying exhibits, we were advised that Exhibit “C” to the letter (ECF Doc. No. 345-3) included documentation deemed confidential by plaintiff pursuant to the protective order in this matter. As such, our offices contacted the Court Clerk to request that the exhibit be sealed, and the Court clerk placed a temporary seal on the document and further advised us that a permanent sealing of the document would require a Court Order. We have since filed a redacted version of the document and provide this letter motion to request that this document be placed under permanent seal pursuant to the Protective Order in this action.

We thank the Court for its time and attention to this matter.

Respectfully,

/s/ Joshua Scerbo  
 Joshua A. Scerbo, Esq.

ECF Doc. No. 345-3 shall be sealed. Counsel should supply an unredacted copy to chambers.

SO ORDERED 7/9/20.

