



Application granted. The Clerk of Court is respectfully requested to seal Plaintiff's November 21, 2024 letter (Doc. 42), Defendant's November 20, 2024 pre-motion letter (Doc. 39), and the Court's order which endorsed Defendant's November 20, 2024 pre-motion letter (Doc. 40), such that the viewing level for each document is restricted to attorneys appearing for the parties herein and court personnel, and retain the summary docket text for the record.

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SO ORDERED.

Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
November 22, 2024

**VIA ECF**

Hon. Philip M. Halpern  
Hon. Charles L. Brieant Jr. Federal Building  
300 Quarropas Street, Courtroom 520  
White Plains, New York 10601

**Re: Otter Products, LLC v. 4PX Express USA Inc., 7:23-cv-11111 (PMH) (VR)**

Dear Judge Halpern:

This firm represents plaintiff, Otter Products, LLC ("Plaintiff"). Defendant, 4PX Express USA Inc. ("Defendant") is represented by Edward Wells and Ruisi "Grace" Guo. We write pursuant to Your Honor's Individual Rules of Practice to respectfully request permission to move for emergency relief, **under seal**, to immediately strike or redact Defendant's November 20, 2024 letter to the Court ("Letter") and redact the subsequent Order reproducing the Letter.

Generally, the Letter contains sensitive information in violation of Your Honor's Individual Rule of Practice 5(a). Additionally, the Letter contains other confidential aspects that are similarly repeated in the joint statement of facts appended to the Letter; notwithstanding Plaintiff's directive to remove such confidential statements. As will be detailed in Plaintiff's sealed motion, Defendant's conduct was knowingly and willfully in violation of Your Honor's Individual Rule of Practice 5(a), directive from Plaintiff's counsel, and the arrangement between the parties.

Accordingly, Plaintiff respectfully requests to file its motion addressing these limited issues **under seal**.

Respectfully Submitted,

LEE LAW PLLC

By:   
Michael Lee (ML 6353)

cc: Counsel of Record (via ECF)