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July 9, 2020

The Honorable Naomi Reice Buchwald  
United States District Judge  
United States Courthouse  
500 Pearl Street, Room 2270  
New York, NY 10007

Re: *Williams et al. v. Equitable Acceptance Corporation, et al.*, 18-CV-07537:  
Request for Leave to File Under Seal

Dear Judge Buchwald,

Plaintiffs write pursuant to Rule 2.H.2 of your Honor's Individual Practices and in connection with the parties' June 8, 2020 letter [Dkt. 93] to Your Honor to respectfully request leave to file portions of the Second Amended Complaint under seal.

As outlined in the parties' joint letter, dated June 8, 2020, counsel for Plaintiffs and for Defendant Equitable Assurance Corporation ("EAC") have conferred regarding the proposed redactions to Plaintiffs' Second Amended Complaint. EAC has indicated that the content reflected in Paragraph 283, 338, 399-409, 629-634, 636-641, 643, 645, the last two bullet points of Paragraph 517, and subsections (f)(i)-(iv) of the Prayer for Relief, "constitutes sensitive commercial data, commercial/business information, and financial data, as well as information which, if disclosed, would reveal non-public, sensitive information." EAC also has requested that the names of non-party witnesses referenced in Paragraphs 301, 303, 305, 310, 335, 336, 345, and 530, also be filed under seal.

Plaintiffs believe that the requested redactions are sufficiently tailored such that they will not impede the public's access to or understanding of the nature of the allegations or the issues in dispute. On that basis, and in order to avoid further motion practice, Plaintiffs do not object to EAC's requests and asks that the Court grant leave to file the Second Amended Complaint under seal, with those limited portions redacted in the publicly available version.

*[Signature Page Follows]*

Respectfully Submitted,

/s/ Jonathan Oblak

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