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MEMO ENDORSED

December 13, 2018

Honorable Kimba M. Wood
United States District Judge
United States Courthouse
500 Pearl Street, Room 18B
New York, New York 10007

USDS SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 12/17/18

Re: *Gulino v. Board of Education*, 96-CV-08414 (KMW)

Dear Judge Wood:

Pursuant to Federal Rule of Civil Procedure 5.2, Local Rule of the U.S. District Court for the Southern District of New York 5.1, and this Court's Individual Rules and Practices, the parties jointly submit this letter motion for leave to maintain under seal unredacted copies of certain Classwide Exhibits filed with the Court. In connection with this request, a DVD has been provided to the Court labeled "Classwide Stipulated Exhibits and Special Master Conference Summaries - Filed Under Seal." This DVD contains unredacted references to sensitive personal information of class members and non-class members, and pursuant to Fed. Rule of Civil Procedure 5.2, may not be filed on the public docket. Accordingly, the parties request that the Clerk be directed to maintain this DVD under seal to protect this information from disclosure until further order of this Court.

The parties have discussed this joint motion with the Special Master and he recommends that the Court grant the relief requested. Should Your Honor agree, the parties respectfully request that the Court so order this letter and enter it on the docket.



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Respectfully submitted.

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Counsel for Plaintiffs

A handwritten signature in cursive script, appearing to read 'William Fraenkel', written over a horizontal line.

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Counsel for Defendant

cc: John Siffert, Esq.

ON RECOMMENDATION OF THE SPECIAL MASTER

SO ORDERED.

Dated: December 17, 2018

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KIMBA M. WOOD
United States District Judge