

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

H. CRISTINA CHEN-OSTER; SHANNA ORLICH; ALLISON GAMBA; and MARY DE LUIS, on behalf of themselves and all others similarly situated,

Plaintiffs,

-against-

GOLDMAN, SACHS & CO. and THE GOLDMAN SACHS GROUP, INC.,

Defendants.

No. 10-CV-6950-AT-RWL

**JOINT STIPULATION AND [PROPOSED] ORDER**

**WHEREAS**, pursuant to the Court’s Individual Practices in Civil Cases § IV.A, Plaintiffs submitted their Motion for Class Certification (“Motion”) and supporting documents with the Court through a letter dated May 19, 2014;

**WHEREAS**, the Motion referenced and attached materials designated as Confidential, and therefore were filed under seal pursuant to the Protective Order and Confidentiality Agreement (“Protective Order”) governing this matter (ECF No. 51);

**WHEREAS**, Exhibit A to Plaintiffs’ May 19, 2014 letter listed 133 documents that were filed under seal in connection with the Motion;

**WHEREAS**, on June 10, 2014, Magistrate Judge Francis issued an order addressing documents in Exhibit A (ECF No. 242), and ordering that: (i) as agreed by the parties, items 3, 5-14, 16-18, 20-25, 27-28, 30, 33, 36, 40, 43-48, 68-70, 89-116, 119-23, and 127-33 shall be filed without seal; (ii) items 2, 19, and 26 shall be filed without seal after redaction of information upon

which Plaintiffs are not relying; and (iii) denying Plaintiffs' application to unseal the remaining documents without prejudice to renewal following adjudication of Plaintiffs' motion for class certification;

**WHEREAS**, the Southern District of New York's ECF Privacy Policy requires redaction of "personal identifiers," such as social security numbers, dates of birth, financial account numbers, and home addresses;

**WHEREAS**, on February 8, 2019, the parties agreed to redact individual employee names from Goldman Sachs's PeopleSoft database in any documents containing this data that are filed with the Court (ECF No. 665);

**WHEREAS**, the parties agree that disclosure of individuals' names in the items subject to this Stipulation implicates privacy interests of individuals identified in those documents; and

**WHEREAS**, the parties met and conferred and reached the following agreement on certain of the remaining items in Exhibit A,<sup>1</sup> which shall be filed with the following redactions: all names, personal identifiers, and individual contact information shall be redacted; the names of the subjects of the complaints shall be replaced by the corporate title of the subject at the time of the complaint (Analyst, Associate, Vice President, Extended Managing Director, or Participating Managing Director); if the subject was subsequently promoted to Extended Managing Director or Participating Managing Director after the date of the complaint, the corporate title(s) and year(s) of such promotion(s) shall also be included in the filed document.

---

<sup>1</sup> This Stipulation concerns only items 29, 31, 34-35, 37-39, 41-42, 49-67, 71-88, 117-118, 124-126. The parties continue to meet and confer regarding items 2, 19, and 26 from Exhibit A, as well as the associated briefing and declarations.

**IT IS HEREBY STIPULATED, AGREED AND ORDERED** as follows:

1. Pursuant to the agreement outlined above, the parties shall file copies of items 29, 31, 34-35, 37-39, 41-42, 49-67, 71-88, 117-18, 124-26 in Exhibit A redacted in the manner set forth above, not sooner than two weeks after entry of this Order. These items shall be filed concurrently with the documents at issue in ECF No. 1371. The parties shall meet and confer regarding the scope of such redactions prior to the filing. Each party shall provide all other parties with at least one week of notice prior to filing copies of these items. Each party shall bear responsibility for refileing any item originally filed by that party.

2. This Stipulation is without prejudice to applications the parties may make in the future relating to use of evidence outside the context of class certification, in accordance with the Protective Order entered in this action, the Supplemental Protected Order entered in this action (ECF No. 712), Judge Lehrburger's Rules for Redactions and Filing under Seal, and Section IV.A of Judge Torres' Individual Practices in Civil Cases.

Dated: June 10, 2022

By:  /s/ Kelly M. Dermody

Adam T. Klein  
Cara E. Greene  
Melissa L. Stewart  
Christopher Mc Nerney  
OUTTEN & GOLDEN LLP  
685 Third Avenue, 25th Floor  
New York, New York 10017  
Telephone: (212) 245-1000  
Facsimile: (646) 509-2060

By:  /s/ Robert J. Giuffra

Robert J. Giuffra, Jr.  
Sharon L. Nelles  
Ann-Elizabeth Ostrager  
Hilary M. Williams  
SULLIVAN & CROMWELL LLP  
125 Broad Street  
New York, New York 10004  
Telephone: (212) 558-4000  
Facsimile: (212) 558-3588

Kelly M. Dermody (*pro hac vice*)  
Anne B. Shaver (*pro hac vice*)  
Michael Levin-Gesundheit (*pro hac vice*)  
Michelle A. Lamy (*pro hac vice*)  
LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP  
275 Battery Street, 29th Floor  
San Francisco, California 94111-3339  
Telephone: (415) 956-1000  
Facsimile: (415) 956-1008

Rachel Geman  
Jessica Moldovan  
LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP  
250 Hudson Street, 8th Floor  
New York, New York 10013-1413  
Telephone: (212) 355-9500  
Facsimile: (212) 355-9592

*Attorneys for Plaintiffs and the Certified Class*

Amanda Flug Davidoff  
Jeffrey B. Wall (*pro hac vice*)  
SULLIVAN & CROMWELL LLP  
1700 New York Avenue, N.W. Suite 700  
Washington, District of Columbia  
20006-5215  
Telephone: (202) 956-7500

Patrick W. Shea  
PAUL HASTINGS LLP  
200 Park Avenue  
New York, New York 10166  
Telephone: (212) 318-6000

*Attorneys for Defendants*

**SO ORDERED:**

By: \_\_\_\_\_  
HON. ROBERT W. LEHRBURGER

Dated: New York, New York  
\_\_\_\_\_, 2022