

September 14, 2022

Via ECF and E-mail

The Honorable Katherine Polk Failla
U.S. District Court Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

MEMO ENDORSED

**Re: *In re Tether and Bitfinex Crypto Asset Litigation*, 19-CV-09236 (KPF) –
Letter Motion to File Redacted Letter Motion and Exhibit Under Seal**

Dear Judge Failla:

We represent Plaintiffs in the above-referenced action. Pursuant to Rule 9 of this Court's Individual Rules of Practice in Civil Cases, we write to request permission to file Plaintiffs' September 14, 2022, Letter Motion to the Court ("Plaintiffs' Letter Motion") in redacted form and Exhibit 3 to Plaintiffs' Letter Motion under seal.

Exhibit 3 and the related redacted information have been designated as confidential by Defendants under this Court's Protective Order, ECF No. 151. Plaintiffs do not object to the characterization of this exhibit and related redacted information as confidential for the limited purposes of this filing.

Accordingly, Plaintiffs respectfully request leave to file Plaintiffs' Letter Motion in redacted form and Exhibit 3 under seal to avoid any improper disclosure of information Defendants have designated as confidential.

Respectfully submitted,

/s/ Edward Normand
Edward Normand
Velvel Freedman (*pro hac vice*)
Joseph M. Delich
ROCHE FREEDMAN LLP
99 Park Avenue, 19th Floor
New York, NY 10016
kyle@rochefreedman.com
tnormand@rochefreedman.com
vel@rochefreedman.com
jdelich@rochefreedman.com

/s/ Caitlin Halligan
Philippe Z. Selendy
Caitlin Halligan
Andrew R. Dunlap
SELENDY GAY ELSBERG PLLC
1290 Sixth Avenue

New York, NY 10104
pselendy@selendygay.com
challigan@selendygay.com
adunlap@selendygay.com

/s/ Todd M. Schneider
Todd M. Schneider (*pro hac vice*)
Jason H. Kim (*pro hac vice*)
Matthew S. Weiler (*pro hac vice*)
SCHNEIDER WALLACE COTTRELL
KONECKY LLP
2000 Powell Street, Suite 1400
Emeryville, CA 94608
tschneider@schneiderwallace.com
jkim@schneiderwallace.com
mweiler@schneiderwallace.com

*Interim Lead Counsel and Attorneys for
Plaintiffs and the Proposed Class*

Application GRANTED. The Clerk of Court is directed to terminate the pending motion at docket entry 238.

Dated: September 15, 2022
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE