

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP  
FOUR TIMES SQUARE  
NEW YORK 10036-6522

TEL: (212) 735-3000  
FAX: (212) 735-2000  
www.skadden.com

FIRM/AFFILIATE OFFICES

BOSTON  
CHICAGO  
HOUSTON  
LOS ANGELES  
PALO ALTO  
WASHINGTON, D.C.  
WILMINGTON  
BEIJING  
BRUSSELS  
FRANKFURT  
HONG KONG  
LONDON  
MOSCOW  
MUNICH  
PARIS  
SÃO PAULO  
SEOUL  
SHANGHAI  
SINGAPORE  
TOKYO  
TORONTO

DIRECT DIAL  
(212) 735-2129  
DIRECT FAX  
(917) 777-2129  
EMAIL ADDRESS  
ALEXANDER.DRYLEWSKI@SKADDEN.COM

January 13, 2020

**VIA ECF AND FAX**

The Hon. P. Kevin Castel  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

RE: SEC v. Telegram, et al, No. 19-cv-9439(PKC) (S.D.N.Y.)

Dear Judge Castel:

As discussed earlier today with Your Honor's Law Clerk, we write with the consent of Plaintiff to jointly request permission to follow the below procedures with respect to the parties' motions for summary judgment and Plaintiff's motion to strike, which are due today.

Because these filings are expected to contain confidential and/or sensitive information for which one or both parties may request sealing, the parties propose that they exchange unredacted versions of their filings today, work to address any confidentiality concerns implicated, and then file redacted versions on the Court's public docket by Wednesday, January 15, following such efforts. Any party seeking to have documents remain redacted or under seal may thereafter make a request for such treatment.

Thank you for your attention to this matter, and the parties remain available to discuss.

Respectfully submitted,



Alexander C. Drylewski

cc: All counsel of record (via ECF)