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September 14, 2022

Via ECF

Hon. Analisa Torres
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Securities and Exchange Commission v. Ripple Labs, Inc., et al.*, No. 20 Civ. 10832 (AT) (SN) (S.D.N.Y.) (“Action”): Third-Party Application to Seal

Dear Judge Torres:

Pursuant to the Court’s September 12, 2022 Order (Dkt. 620) and Section IV(A)(ii) of Your Honor’s Individual Practices in Civil Cases, we write on behalf of Third-Party A¹ to propose a limited number of targeted redactions to Defendants’ memorandum of law in support of their motion for summary judgment (Dkt. 622) (the “SJ Motion”).

On July 28, 2022, Third-Party A filed a letter motion (the “July 28 Letter”) seeking redactions to exhibits filed in connection with the parties’ *Daubert* motions (Dkt. 582). The SJ Motion, like the *Daubert* motions, references the names of certain Third-Party A employees. Accordingly, for the reasons articulated in our July 28 Letter, we request redaction of the references to Third-Party A employees in connection with the SJ Motion.

The proposed redactions are annexed hereto as Exhibit A (filed under seal).

We thank the Court for its consideration of this matter.

Respectfully submitted,

/s/ Michael A. Hanin
Michael A. Hanin

Enclosures

¹ Third-Party A refers to a non-party subpoenaed for documents and testimony in the Action.