

John L. Cesaroni

From: Jeffrey Sklarz <jsklarz@gs-lawfirm.com>
Sent: Thursday, July 26, 2018 10:09 AM
To: John L. Cesaroni; Matthew Beatman
Cc: Lauren McNair; David T. Grudberg
Subject: Mirilis v Greer

Importance: High

Dear John and Matt

This is Defendants' formal response to your letter concerning designation of materials as confidential. After reviewing the production, the only items that have been designated as "attorney eyes only" are tax returns, which I believe, having reviewed the transcript of the hearing on the motion for entry of protective order, are what they Judge said should be designated as such. As to all other items, I think the Judge made clear that discovery material could be designated as confidential, and this is particularly significant in light of the fact that "Larry Noodles" publishes everything in his blog.

You have expressed a desire to make it less cumbersome to refer to discovery information in pleadings. I think you can achieve this result by referring to matters generally and describing them more specifically in a confidential appendix. For example, if you believe a transfer made by FOH to Greer on January 5, 2018 for \$850 was improper, you would allege "On or about January 5, 2018 Entity #1 transferred \$850 to Greer." You would then indicate in a footnote that the details are included in the confidential appendix where you would list the details of the transaction and any supporting materials, which would then be sealed.

I believe it is unnecessary to be specific or identify any individuals (other than Mr. Greer), because Mr. Dressler has already attempted to speak with employees. There should be no need to make public information that is going to lead to the harassment of Mr. Greer or employees of the Yeshiva or non-parties. Again, while Plaintiff has a legitimate right to obtain information related to collection, Judge Shae has already stated that Mr. Greer has a legitimate privacy right too.

Please let me know if this is acceptable. Otherwise I suggest we ask to have a conference call with Judge Shea to address this issue. I see no reason to have more motion practice to deal with a matter unique to this case (Larry Dressler's blog). Thanks.

**GREEN &
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