



Manbro Energy Corporation v. Chatterjee Advisors, LLC et al

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Mark A. Kirsch Direct: +1 212.351.2662 Fax: +1 212.351.6362 MKirsch@gibsondunn.com July 26, 2021
VIA ELECTRONIC FILING The Honorable Lorna G. Schofield United States District Court
Southern District of New York 500 Pearl Street New York, New York 10007 Re: Manbro Energy
Corp. v. Chatterjee Advisors, LLC et al., No. 20-cv-3773 (LGS) Dear Judge Schofield: Pursuant to
Paragraph 11 of the Stipulation and Order of Confidentiality, dated October 21, 2020, Dkt. No. 51
("Confidentiality Order") (which incorporates the Court's Individual Rule I(D)(3)), I write respectfully
on behalf of Defendants to request that Defendants' letter response to Plaintiff's pre-motion letter
seeking to strike the rebuttal report filed by Defendants' valuation expert, Marc. J. Brown (the
"Letter"), be filed under seal. Defendants' Letter references the expert reports authored by Plaintiff's
valuation expert, Dr. Antoinette Schoar, that Plaintiff has designated as Confidential Information or
Discovery Material, as defined in the Confidentiality Order. Parties and attorneys of record who
should have access to the sealed document are listed in Appendix A. Pursuant to Paragraph I.D.3 of
the Court's Individual Rules, Defendants note that they are not the parties "with an interest in
confidential treatment" of information contained in the Letter. Indiv. R. & P. ¶ I.D.3. Absent
objection by Plaintiff, Defendants would not oppose filing the Letter on the public docket without
redactions. Respectfully, /s/ Mark A. Kirsch Mark A. Kirsch cc: All counsel of record (via ECF)

Appendix A – Parties and Attorneys of Record Parties Manbro Energy Corporation Chatterjee
Advisors, LLC Chatterjee Fund Management, LP Chatterjee Management Company, d/b/a The
Chatterjee Group Purnendu Chatterjee Gibson, Dunn & Crutcher LLP Randy M. Mastro Mark A.
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