

Simpson Thacher & Bartlett LLP

425 LEXINGTON AVENUE
NEW YORK, NY 10017-3954

TELEPHONE: +1-212-455-2000
FACSIMILE: +1-212-455-2502

Direct Dial Number

+1-212-455-2228

E-mail Address

gwang@stblaw.com

PUBLIC VERSION

BY EMAIL

June 24, 2025

Re: *Google LLC, v. Does 1-25*, No. 25-CV-04503 (JPO)
(S.D.N.Y.)

Honorable J. Paul Oetken
United States District Judge
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Dear Judge Oetken:

Pursuant to Rule 2.E of Your Honors Individual Rules and Practices in Civil Cases (“Individual Practices”), Zhejiang Alibaba Cloud Computing Ltd. (“the Company”) respectfully requests leave to seal the letter filed contemporaneously herewith (the “Letter”) and to redact the highlighted sentences in the instant motion (together with the Letter, the “Sealed Information”).

[REDACTED]

[REDACTED] This District “recognizes that the public perception after disclosure that such non-parties engaged in wrongdoing may cause reputational harm that is difficult, if not impossible, to repair.” *Harrington Glob. Opportunity Fund v. Securities*, No. 1:21-cv-761, 2025 U.S. Dist. LEXIS 112472, at *4-5 (S.D.N.Y. June 6, 2025); *In re B & C KB Holding GmbH*, No. 22-MC-180, 2023 U.S. Dist. LEXIS 27090, at *2 (S.D.N.Y. Feb. 14, 2023) (“unadjudicated allegations of wrongdoing” against third party are valid basis to seal documents and information).

[REDACTED] *Giuffre v. Maxwell*, 2024 U.S. Dist. LEXIS 2883, at *3 (S.D.N.Y. Jan. 5, 2024) (declining to unseal identity of

