UNITED STATES DISTRICT COURT DISTRICT OF CONNECTICUT

ELIYAHU MIRLIS,

Plaintiff, Case No. 3:19-cv-00700 (CSH)

v.

EDGEWOOD ELM HOUSING, INC.; F.O.H., INC.; EDGWEOOD VILLAGE, INC.; EDGEWOOD CORNERS, INC.; AND YEDIDEI HAGAN, INC.,

Defendants. November 23, 2021

> **DEFENDANTS' REPLY MEMORANDUM** IN SUPPORT OF MOTION TO SEAL

In a remarkably impetuous filing, Plaintiff objects to Defendants' Motion to Seal Legal Fees Affidavits. Plaintiff is not a resident of Connecticut, yet feigns concern about public donations given by Connecticut residents, entities or public sources to the Defendants to justify his objection to the Motion to Seal. Plaintiff's purported concern about the Court's openness is actually driven by his self-serving desire to continue helping the bias news entity that he improperly attached three (3) separate articles from to his Memorandum in Opposition to Defendants' Motion to Modify Temporary Restraining Order (ECF No. 71). Indeed, a simple reading of those bias articles makes clear that the author has already adjudicated the veil piercing claims in this case and is vastly publishing his judgment, despite having no evidence or trial on the matter.

Simply stated, what a person or a party spends on legal fees is indeed protectable, sensitive financial information and not of sufficient interest to the general public to allow the wholesale dissemination of such information. This is especially true where the publication of such information will be done (and is shamelessly requested by Plaintiff here) for the clear purpose of prejudicing the Defendants in the public and consequently in this action.

DEFENDANTS, EDGEWOOD ELM HOUSING, INC.; F.O.H., INC.; EDGWEOOD VILLAGE, INC.; EDGEWOOD CORNERS, INC.; AND YEDIDEI HAGAN, INC.,

By: /s/Richard P. Colbert
Richard P. Colbert
Day Pitney LLP
195 Church Street, 15th Floor
New Haven, CT 06510
T: (203) 752-5000
F: (203) 752-5001
rpcolbert@daypitney.com

110429491.1 -2-

CERTIFICATE OF SERVICE

I hereby certify that on November 23, 2021, the foregoing was filed electronically and

served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent

by e-mail to all parties by operation of the Court's electronic filing system or by mail to

anyone unable to accept electronic filing. Parties may access this filing through the Court's

CM/ECF system.

/s/ Richard P. Colbert

Richard P. Colbert