

K&L GATES

September 18, 2020

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Hon. Victor Marrero  
U.S. District Court  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

**RE: Viamedia, Inc. v. WideOpenWest Finance, LLC, No. 1:20-cv-4064-VM**

Dear Judge Marrero:

We represent Viamedia, Inc. (“Viamedia”) in the above-referenced action. We write briefly in response to the September 17, 2020 letter submitted by WideOpenWest Finance, LLC (“WOW”).

We join in WOW’s request to allow limited, commercially sensitive information in the arbitral Panel’s award to be filed under seal, with a lightly redacted version filed publicly. Specifically, the redactions to the Panel’s award relate to: (a) historical financial information regarding Viamedia’s financial metrics and cash position, which have never been disclosed in a public form (as Viamedia is a privately-held company); and (b) confidential financial information concerning a new technology developed by Viamedia, for which the potential revenue forecast of the technology has, again, never been disclosed in any public fashion.<sup>1</sup>

Accordingly, Viamedia respectfully requests that you approve the filing of limited portions of information in the Panel’s award under seal.

Best Regards,

*s/ Luke E. Steinberger*

Luke E. Steinberger

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<sup>1</sup> This more detailed description was not included in WOW’s September 17, 2020 letter due to a miscommunication between WOW’s counsel.