

**UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
NEW YORK**

Telecom Business Solution, LLC, et al. v. Terra Towers Corp., et al.

Telecom Business Solution · No. 1:22-cv-01761 · Decided December 5, 2025

SUMMARY

This document is a letter motion filed by Telecom Business Solution, LLC, LATAM Towers, LLC, and AMLQ Holdings (Cay), Ltd. in the United States District Court for the Southern District of New York. Petitioners request leave to file two forthcoming motions and related responses under seal and seek expedited briefing concerning a shareholders agreement and an ongoing sale process. The court granted the requests.

OPINION

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Sora e □□□ i DOC # Gregg L. Weiner Michael N. Ungar DATE FILED: (2 □□□□ Ropes & Gray
LLP UB Greensfelder LLP I __ 1211 Avenue of the Americas 1660 W. 2nd Street, Sté-T [00 New
York, NY 10036 Cleveland, Ohio 44113 BY CM/ECF & HAND DELIVERY The Honorable
Lewis A. Kaplan Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York,
NY 10007-1312 Re: Telecom Business Solution, LLC, et al. v. Terra Towers Corp., et al., No. 22-
cy-01761 Your Honor: We represent petitioners Telecom Business Solution, LLC and LATAM
Towers, LLC (collectively, “Peppertree”), and AMLQ Holdings (Cay), Ltd. (“AMLQ,” together
with Peppertree, “Petitioners”) in the above-captioned action.

Pursuant to Federal Rule of Civil Procedure 5,.2(d), S.D.N.¥ L. Civ. R. 7.1(e), and \$.D.N.Y. ECF
Rule 13.1, Petitioners respectfully request (i) leave to file under seal two forthcoming motions
related to the Shareholders Agreement this action arises from (ECF 259-1) and that the Court
order any responses to the motions likewise be filed under seal, and (ii) that the Court order
expedited briefing on the motions.

First, as the Court is aware, having previously ordered the sealing of filings in this action on
multiple occasions (see, e.g., ECF 218), the Shareholders Agreement contains a confidentiality
provision under which the parties agreed not to disclose any confidential information disclosed to
it by another shareholder, subject to limited exceptions. See ECF 259-1 § 6.03.

The Shareholders Agreement also included a provision providing for the sale of Continental
Towers Latam Holdings, Ltd. (the “Company”), which this Court has issued multiple orders
enforcing. See ECF 124; ECF 295. “[C]ourts have consistently found that confidential

commercial information of a business—including confidential research, internal business documents and information about a business’s operations are the proper subject of sealing.”!

Petitioners’ forthcoming motions contain competitively sensitive and confidential information regarding the Company and the sale process that is being conducted pursuant to the Court’s orders and that is covered by the confidentiality provisions of the Shareholders Agreement.

Accordingly, Petitioners respectfully request leave to *PharmacyChecker.com LLC v. Nat’l Ass’n of Boards of Pharmacy*, 2022 WL 4956050, at *2 (S.D.N.Y. Aug. 26, 2022); see also *Signify Holding B.V. v. TP-Link Rsch. Am. Corp.*, 2022 WL 3704002, at *1 (S.D.N.Y. Aug. 26, 2022) (sealing warranted to protect “sensitive business information”); *Halberg on behalf of Goldman Sachs 401(k) Plan v. Goldman Sachs Grp, Inc.*, 2022 WL 601967, at *2 (S.D.N.Y.

Mar. 1, 2022) (“Courts in this District routinely permit redaction and sealing of... competitively sensitive business information.”). woe 12° PLL DAME POEL Sree PIS Leiter 2 raye 4 Wie file the motions, and the documents filed therewith under seal, and order that any ensuing responses likewise be filed under seal. □ Second, because the motions seek relief related to the ongoing sale process that, for the reasons set forth in Petitioners’ briefs in support of the motions, is needed on an urgent basis, the Court should also order expedited briefing on the motions.

Specifically, Petitioners request that the periods to file answering and reply briefs regarding the motions under Local Civ. R. 6.1(b) each be shortened by three days, such that Respondents’ opposition briefs are due on Monday, December 15, and Petitioners’ replies are due on Friday, December 19. This schedule would allow briefing on the motions to be completed before the upcoming holiday period.

We thank the Court for its consideration of these requests. Respectfully submitted, /s/ Gregg L. Weiner /s/ Michael N. Ungar Gregg L. Weiner Michael N. Ungar Counsel for AMLO Holdings (Cay), Ltd. Counsel for Telecom Business Solution, LLC and LATAM Towers, LLC GRANTED so por SY fp ja A _ OO antes By MA Sat LEWIS A. iitfpeak USDJ -2-