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November 9, 2005

VIA HAND DELIVERY

The Honorable Catherine C. Blake
United States District Court Judge
United States District Court
District of Maryland
101 West Lombard Street
Baltimore, MD 21201

Re: *In re Royal Ahold NV Securities and ERISA Litigation* - MDL 03-01539

Dear Judge Blake:

Enclosed is a copy of each of the following documents that Lead Plaintiffs respectfully request to be filed under seal pursuant to paragraph 3 of the Order Governing the Confidential Treatment of Discovery Material (the "Confidentiality Order") in this litigation (Docket No. 82):

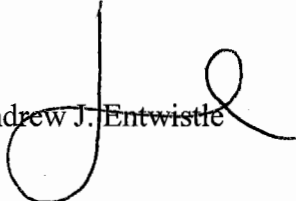
1. The transcript of the deposition of Martin Paulsen, taken on October 18, 2005;
2. The transcript of the deposition of James Liptak, taken on October 19, 2005;
3. The transcript of the deposition of Daniel G. Viola, taken on October 21, 2005;
4. The transcript of the deposition of Joachin Schallmayer, taken on October 28, 2005; and
5. The transcript of the deposition of Joachin von Cornberg, taken on October 31, 2005.

Lead Plaintiffs seek to file the above-referenced documents under seal because they contain information that constitutes Discovery Material, as defined in paragraph 1 of the Confidentiality Order. Lead Plaintiffs reserve all rights under the Confidentiality Order.

Pursuant to paragraph 3 of the Confidentiality Order and L.R. 104.13(c), Lead Plaintiffs have simultaneously filed an Interim Sealing Motion and Proposed Order. A courtesy copy of the Interim Sealing Motion is enclosed.

I am available should Your Honor have any questions.

Respectfully submitted,


Andrew J. Entwistle

cc: All Counsel (via ECF)

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

IN RE ROYAL AHOLD N.V. SECURITIES &
ERISA LITIGATION

X
§
§ Civil No.: 1:03-MD-01539
§
§ ALL SECURITIES ACTIONS
X

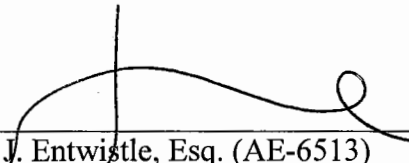
NOTICE OF FILING OF DOCUMENTS UNDER SEAL

The following documents have been filed under seal with the Clerk's Office in paper format:

1. The transcript of the deposition of Martin Paulsen, taken on October 18, 2005;
2. The transcript of the deposition of James Liptak, taken on October 19, 2005;
3. The transcript of the deposition of Daniel G. Viola, taken on October 21, 2005;
4. The transcript of the deposition of Joachin Schallmayer, taken on October 28, 2005; and
5. The transcript of the deposition of Joachin von Cornberg, taken on October 31, 2005.

Within 24 hours of the filing of this Notice, a compact disc containing a Portable Document Format ("PDF") copy of each the above documents will be served on counsel on the attached service list via U.S. mail.

Dated: November 9, 2005



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