

October 20, 2020

VIA ECF

The Honorable Loretta A. Preska District Court Judge United States District Court Southern District of New York 500 Pearl Street New York, NY 10007

Re: Giuffre v. Maxwell, Case No. 15-cv-7433-LAP

Dear Judge Preska,

We represent Plaintiff Virginia Giuffre in this matter and write to confirm that, pursuant to the Court's orders dated July 28, 29, and 30, and October 20, 2020 (ECF Nos. 1077, 1079, 1087, and 1127), Plaintiff may file the remaining documents listed in Exhibit A to Plaintiff Virginia Giuffre's Opposition to Defendant Ghislaine Maxwell's Objections to Unsealing Docket Entries 143, 164, 172 199, and 230 (ECF No. 1068-1) later today.

By order dated October 19, 2020, after expedited briefing and a hearing held on October 13, 2020, the Second Circuit affirmed this Court's order (ECF No. 1126), rejecting Maxwell's objections to the unsealing of "Ms. Maxwell's and Doe 1's depositions transcripts and any sealed materials that quote or disclose from them" (ECF No. 1079 at 3-4). The Court already reviewed and approved Plaintiff's proposed redactions for these documents, and Plaintiff has verified that redactions are in place for each of the categories of information identified in the Court's July 30 and October 20 orders. ECF No. 1087 at 3 (holding that the Court "approves as appropriate Ms. Giuffre's proposed redactions to the sealed materials"); ECF No. 1127.

For the foregoing reasons, Plaintiff respectfully requests the Court's confirmation that she may file the documents at issue on ECF. Pursuant to the Court's July 28 order, Plaintiff will file the documents under a heading of "Documents Ordered Unsealed by Order of July 23, 2020." ECF No. 1077.

Sincerely,

/s/ Sigrid McCawley

Sigrid S. McCawley, Esq.

cc: Counsel of Record (via ECF)

BOIES SCHILLER FLEXNER LLP

¹ Doe 1's name is redacted from the materials that will be filed.