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

Re: Proposed Redactions to Sealed Materials Related to Non-Parties
Giuffre v. Ghislaine Maxwell, No. 15 Civ. 7433 (LAP)

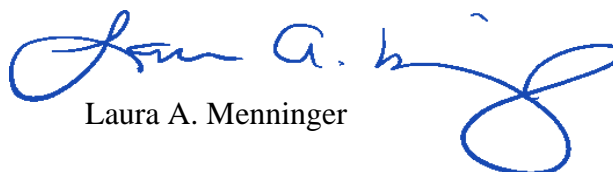
Dear Judge Preska:

By contemporaneous email to the Court, Ms. Maxwell is submitting any proposed redactions to the materials to be unsealed tomorrow morning that are in conflict with Plaintiff's proposed redactions. These redactions all relate to "descriptions of nonparty conduct that would allow readers to discern the identity of a given non-party."

Last night at 8:15 p.m., counsel for Ms. Maxwell received Plaintiff's proposed redactions. Counsel reviewed the proposed redactions to Ms. Maxwell's 465-page deposition transcript and conferred with Plaintiff's counsel regarding her proposed redactions during a telephone conference at 1 p.m. today. While undersigned counsel explained the bases for her disagreement and pointed out other areas that should be redacted, Ms. McCawley simply stated that she disagreed without explanation.

Counsel for Ms. Maxwell believes that her proposed additional redactions comport with the Court's direction that Non-Parties be given the opportunity to review and object before any information identifying their identity or any conduct attributed to them (including as either an alleged victim of Mr. Epstein's abuse or as a perpetrator of any such abuse) is disclosed publicly.

Respectfully submitted,



Laura A. Menninger

CC: Counsel of Record *via* ECF