



Haddon, Morgan and Foreman, P.C.
Laura A. Menninger

150 East 10th Avenue
Denver, Colorado 80203
PH 303.831.7364 FX 303.832.2628
www.hmflaw.com
LMenninger@hmflaw.com

November 12, 2020

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

Re: Motion to File Under Seal
Giuffre v. Ghislaine Maxwell, No. 15 Civ. 7433 (LAP)

Dear Judge Preska:

This is a letter motion seeking leave to permit Ms. Maxwell to file a redacted Memorandum of Law in Support of Objections to Unsealing Sealed Materials Related to DEs 231, 279, 315, 320 & 335 and to file under seal Exhibit D thereto.

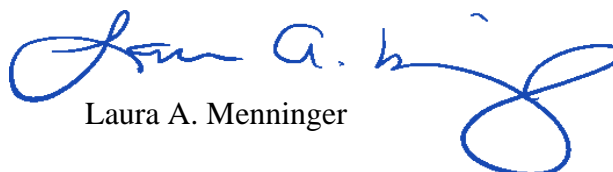
The Protective Order governing this case states:

Whenever a party seeks to file any document or material containing CONFIDENTIAL INFORMATION with the Court in this matter, it shall be accompanied by a Motion to Seal pursuant to Section 6.2 of the Electronic Case Filing Rules & Instructions for the Southern District of New York.

Doc. # 62 at 4. The Memorandum of Law and Exhibit D contain information deemed CONFIDENTIAL by the parties pursuant to the Protective Order. References to and discussion of specific CONFIDENTIAL materials are necessary to support Ms. Maxwell's request that these materials remain under seal.

Ms. Maxwell intends to file the redacted version of the Memorandum publicly on ECF and seeks leave only to file the unredacted version and Exhibit D under seal.

Respectfully submitted,



Laura A. Menninger

CC: Counsel of Record *via* ECF