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November 12, 2020

Honorable Loretta A. Preska United States District Court Southern District of New York 500 Pearl Street New York, NY 10007 Ms. Maxwell's request to file (i) a redacted version of her Memorandum of Law in Support of Objections to Unsealing and (ii) Exhibit D thereto under seal is GRANTED. SO ORDERED.

Loutta a. Preskg 11/13/2020

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