

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 24, 2020

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

Re: *Giuffre v. Maxwell*, No. 15 Civ. 7433 (LAP) Unopposed Request for Two (2) Day Extension of Time to file Reply

Dear Judge Preska:

On behalf of Ghislaine Maxwell, I write to request a brief two (2) day extension of time within which to file a reply in support of Ms. Maxwell's Objections to Unsealing (DE 1149), to and including <u>December 1, 2020</u>. Counsel for plaintiff does not object to the extension.

Under the updated Order and Protocol for Unsealing Decided Motions (DE 1108), any reply in support of an objection to unsealing filed by an Original Party is due "within 7 days of service" of the opposition to such an objection. Id. ¶ 2(f). Plaintiff served her opposition to unsealing on November 19, 2020, thus any reply currently is due November 27. That day is the day after Thanksgiving.

Because defense counsel's office is scheduled to be closed for the holiday weekend during that period of time, we request a brief two (2) extension of the deadline for the reply within which to finalize the supporting memorandum of law and exhibits. Counsel for Ms. Maxwell hereby respectfully requests the Court extend the period for the reply to and including December 1, 2020.

Respectfully submitted,

Laura A. Menninger

CC: Counsel of Record via ECF