

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
VIRGINIA L. GIUFFRE,

Plaintiff,
v.
GHISLAINE MAXWELL,

Defendant.
-----X

15-cv-07433-LAP

**Declaration of Laura A. Menninger in Further Support of Ms. Maxwell's
Objections to Unsealing Sealed Materials Related to
Docket Entries 231, 279, 315, 320, & 335**

I, Laura A. Menninger, declare as follows:

1. I am an attorney at law duly licensed in the State of New York and admitted to practice in the United States District Court for the Southern District of New York. I am a member of the law firm Haddon, Morgan & Foreman, P.C., counsel of record for Defendant Ghislaine Maxwell ("Maxwell") in this action. I respectfully submit this declaration in further support of Ms. Maxwell's Objections to Unsealing Sealed Materials Related to Docket Entries 231, 279, 315, 320, & 335.

2. Attached as Exhibit E (Filed Under Seal) is true and correct copy of DE 340-1 with Ms. Maxwell's Proposed Redactions as described in her Reply Memorandum.

3. Attached as Exhibit F is an Amended summary chart of Ms. Maxwell's and Plaintiff's Position on Docket Entries 231, 279, 315, 320, & 335. Ms. Maxwell amended her original chart to, *inter alia*, include Plaintiff's position, to correct some entries wherein the

Second Circuit had already released some of the materials at issue, and to include information (where appropriate) that a Non-Party had not received Notice of the Protocol.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 1, 2020.

By: /s/ *Laura A. Menninger*

Laura A. Menninger

CERTIFICATE OF SERVICE

I certify that on December 1, 2020, I electronically served this *Declaration of Laura A. Menninger in further support of Ms. Maxwell's Objections to Unsealing Sealed Materials Related to Docket Entries 231, 279, 315, 320, & 335* via ECF on the following:

Sigrid S. McCawley
Meredith Schultz
BOIES, SCHILLER & FLEXNER, LLP
401 East Las Olas Boulevard, Ste. 1200
Ft. Lauderdale, FL 33301
smccawley@bsfllp.com
mschultz@bsfllp.com

Bradley J. Edwards
Stan J. Pottinger
EDWARDS POTTINGER LLC
425 North Andrews Ave., Ste. 2
Ft. Lauderdale, FL 33301
brad@pathtojustice.com
StanPottinger@aol.com

Christine N. Walz
HOLLAND & KNIGHT LLP
31 West 52nd Street
New York, NY 10019
Christine.walz@hklaw.com

Paul G. Cassell
383 S. University Street
Salt Lake City, UT 84112
cassellp@law.utah.edu

Andrew G. Celli
David Lebowitz
Emery Celli Brinckerhoff & Abady LLP
600 Fifth Avenue at Rockefeller Center
10th Floor
New York, NY 10020
acelli@ecbalaw.com
dlebowitz@ecbalaw.com

Jay M. Wolman
Marc J. Randazza
RANDAZZA LEGAL GROUP, PLLC
100 Pearl Street, 14th Floor
Hartford, CT 06103
jmw@randazza.com
mjr@randazza.com

/s/ Nicole Simmons

Nicole Simmons

EXHIBIT E
FILED UNDER SEAL

EXHIBIT F

**Defendant's Amended Position on Docket Entries 231, 279, 315, 320, & 335
(combined with Plaintiff's Position)**

DOC. #	DATE FILED	DEFENDANT'S POSITION	C/I ¹	PLAINTIFF'S POSITION
231	6.20.16	Redact all quotes from Ms. Maxwell and Non-Party deposition testimony, Non-Party identifying information, and argument of counsel violative of Local Criminal Rule 23.1.	C1-1 C1-2 C1-3 C1-4	Unseal and redact only (1) medical information and (2) names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
232	6.20.16	Redact all Non-Party witness names and identifying information.	C1-1 C1-2 C1-3 C1-4	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
232-7	6.20.16	Redact all Non-Party witness names and identifying information – in same manner as DE 1090-32	C1-1 C1-2 C1-3 C1-4	Unseal and redact only (1) medical information and (2) names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The full version of this deposition transcript was unsealed by this Court on July 30, 2020, DE 1090-32. If this excerpt of the transcript is unsealed, it should be redacted in the same way as DE 1090-32, but the redactions of the names of Non-Parties whose time to object has expired should be removed.

¹ Key:

CI-1 - Reasonable reliance the Protective Order by a party or non-party.

CI-2 - Prevention of the abuse of court records and files.

CI-3 - Annoyance, embarrassment, oppression, undue burden ("Privacy Interests").

CI-4 - Preserving the fundamental rights of suspects or others under criminal investigation – including due process right to a fair trial and impartial jury unimpaired by excessive publicity, release of potentially inadmissible evidence for the Criminal Action, or improper revelation of a potential witness or their potential testimony.

CI-5 - Improper submission of documents thereby weaponizing judicial documents.

CI-6 - Untrustworthy, unreliable, and incorrect information.

CI-7 - Non-Judicial Documents.

DOC. #	DATE FILED	DEFENDANT'S POSITION	C/I ¹	PLAINTIFF'S POSITION
232-8	6.20.16	Keep sealed – Non-Party reliance on Protective Order; potential witness in criminal trial	C1-1 C1-2 C1-3 C1-4	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The Original Parties sent the Non-Party deponent (Doe 131) notice of unsealing, and the Non-Party deponent did not request excerpts.
232-9	6.20.16	No objection to unsealing		Keep sealed (medical records).
232-10	6.20.16	No objection to unsealing		Keep sealed (medical records).
232-11	6.20.16	No objection to unsealing		Unseal. Note: Original Parties agree.
255	6.28.16	Not sealed		
257	6.28.16	Redact all quotes from Ms. Maxwell and Non-Party deposition testimony, Non-Party identifying information, and argument of counsel violative of Local Criminal Rule 23.1.	CI-2² CI-3 CI-4 CI-5 CI-6 CI-7	Unseal and redact only (1) medical information and (2) names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
258	6.28.16	Keep sealed – Non-Party reliance on Protective Order	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.

² Ms. Maxwell notes that Response Brief is filled with irrelevant information and misleading deposition excerpts that are wholly irrelevant to the underlying motion for sanctions for failure to comply with discovery obligations relating to plaintiff's medical information. These arguments were made, and documents filed, for purposes of distraction and harassment, and have nothing to do with the issues presented by the motion. This is classic abuse of the courts records and files. The Response and Exhibits were not referenced in the Order, and the exhibits are not properly considered judicial documents.

DOC. #	DATE FILED	DEFENDANT'S POSITION	C/I ¹	PLAINTIFF'S POSITION
258-1	6.28.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Keep sealed until Non-Party deponent (Doe 151) time to object expires. Note: Original Parties agree to keep sealed, but for different reasons.
258-2	6.28.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Keep sealed until Non-Party deponent (Doe 160) time to object expires. Note: Original Parties agree to keep sealed, but for different reasons.
258-3	6.28.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial and depo testimony potential evidence; Second Circuit redacted this Doe's name and information; Non-Party notice returned to sender	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The Original Parties sent the Non-Party deponent (Doe 83) notice of unsealing, and the Non-Party deponent did not request excerpts.
258-4	6.28.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial and deposition testimony potential evidence	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The deponent is not on the Non-Party notification list because he is a law enforcement officer.
258-5	6.28.16	No objection to unsealing		Unseal but redact medical information and addresses.

DOC. #	DATE FILED	DEFENDANT'S POSITION	C/I ¹	PLAINTIFF'S POSITION
258-6	6.28.16	No objection to unsealing		Unseal but redact medical information and addresses.
258-7	6.28.16	No objection to unsealing		Unseal but redact tax returns and addresses.
258-8	6.28.16	No objection to unsealing		Keep sealed (medical records).
258-9	6.28.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial and deposition testimony potential evidence The Non-Party Notice sent to this Doe was returned as undelivered to defense counsel.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The Original Parties sent the Non-Party deponent (Doe 67) notice of unsealing, and the Non-Party deponent did not request excerpts.
258-10	6.28.16	No objection to unsealing		Unseal but redact medical information.
261	7.1.16	Redact all quotes from Ms. Maxwell and Non-Party deposition testimony, Non-Party identifying information, and argument of counsel violative of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal and redact only (1) medical information and (2) names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
269	7.8.16	No objection to unsealing		Unseal but redact medical information.
270	7.8.16	No objection to unsealing		Unseal. Note: Original Parties agree.
270-1	7.8.16	No objection to unsealing		Keep sealed (medical records).

DOC. #	DATE FILED	DEFENDANT'S POSITION	C/I ¹	PLAINTIFF'S POSITION
270-2	7.8.16	Redact all Non-Party witness names and identifying information -- in same manner as DE 1090-32	CI-1 CI-2 CI-3	Unseal and redact only (1) medical information and (2) names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The full version of this deposition transcript was unsealed by this Court on July 30, 2020, DE 1090-32. If this excerpt of the transcript is unsealed, it should be redacted in the same way as DE 1090-32, but the redactions of the names of Non-Parties whose time to object has expired should be removed.
270-3	7.8.16	No objection to unsealing		Unseal but redact address.
270-4	7.8.16	No objection to unsealing		Unseal. Note: Original Parties agree.
270-6	7.8.16	No objection to unsealing		Unseal. Note: Original Parties agree.
272		Not sealed.		Unseal. Note: Original Parties agree.
272-1	7.12.16	Keep Sealed – if unsealed, make any medical information redactions consistent with the Reply (DE 269)	CI-6 CI-7	Unseal and redact only (1) medical information and (2) names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
272-2	7.12.16	No objection to unsealing		Unseal. Note: Original Parties agree.

DOC. #	DATE FILED	DEFENDANT'S POSITION	C/I ¹	PLAINTIFF'S POSITION
272-3	7.12.16	No objection to unsealing		Keep sealed (medical records).
272-4	7.12.16	No objection to unsealing		Unseal but redact medical information.
272-5	7.12.16	Already publicly filed (DE 45)		Already publicly filed (DE 45).
272-6	7.12.16	Already publicly filed (DE 31)		Already publicly filed (DE 31).
272-7	7.12.16	Keep sealed	CI-2 CI-3 CI-4 CI-5	Unseal but redact (1) information about Plaintiff when a minor and (2) medical information.
272-8	7.12.16	No objection to unsealing		Keep sealed (medical records)
272-9	7.12.16	No objection to unsealing		Unseal. Note: Original Parties agree.
272-10	7.12.16	Redact all Non-Party witness names and identifying information – in same manner as DE 1090-32.	CI-1 CI-2 CI-3	Unseal and redact only (1) medical information and (2) names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The full version of this deposition transcript was unsealed by this Court on July 30, 2020, DE 1090-32. If this excerpt of the transcript is unsealed, it should be redacted in the same way as DE 1090-32, but the redactions of the names of Non-Parties whose time to object has expired should be removed.
303	7.25.16	No objection to unsealing – if unseal, make medical information redactions consistent with Reply (DE 269)		Unseal but redact medical information.

DOC. #	DATE FILED	DEFENDANT'S POSITION	C/I ¹	PLAINTIFF'S POSITION
304	7.25.16	No objection to unsealing		Unseal. Note: Original Parties agree.
304-1	7.25.16	No objection to unsealing		Unseal but redact medical information.
304-2	7.25.16	No objection to unsealing		Keep sealed (medical records).
304-3	7.25.16	No objection to unsealing		Keep sealed (medical records).
304-4	7.25.16	No objection to unsealing		Unseal but redact medical information.
313	7.29.16	Already publicly filed		
313-1	7.29.16	No objection to unsealing		Unseal but redact medical information.
279	7.13.16	Redact all quotes from Ms. Maxwell and Non-Party deposition testimony, Non-Party identifying information, and argument of counsel violative of Local Criminal Rule 23.1.	CI-1 CI-2 CI-3 CI-4	Unseal in full.
280	7.13.16	Redact all quotes from Ms. Maxwell and Non-Party deposition testimony, Non-Party identifying information, and argument of counsel violative of Local Criminal Rule 23.1.	CI-1 CI-2 CI-3 CI-4	Unseal in full.
280-1	7.13.16	Redact all names and identifying information for Ms. Maxwell and Non-Parties	CI-1 CI-2 CI-3 CI-4 CI-6	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.

DOC. #	DATE FILED	DEFENDANT'S POSITION	C/I ¹	PLAINTIFF'S POSITION
280-2	7.13.16	Keep sealed – release only 2d Cir. DE 283-Ex. 45	CI-1 CI-2 CI-3 CI-4 CI-6	Unseal subject to Second Circuit redactions. Note: This document was released by the Second Circuit with redactions. The redactions should match the Second Circuit redactions.
288	7.15.16	Not sealed		
288-1	7.15.16	Not sealed		Unseal in full.
288-2	7.15.16	Not sealed		Unseal in full.
289	7.18.16	Not sealed		
290	7.18.16	Redact identifying information and email address.	CI-1 CI-2 CI-3	Unseal in full.
291	7.18.16	Not sealed		
291-1	7.18.16	No position. Not sealed at 188-1		Unseal in full.
291-2	7.18.16	Keep sealed	CI-2 CI-3 CI-4 CI-7	Unseal in full.
291-3	7.18.16	Keep sealed	CI-2 CI-3 CI-4 CI-7	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.

DOC. #	DATE FILED	DEFENDANT'S POSITION	C/I ¹	PLAINTIFF'S POSITION
300	7.22.16	Not sealed		
300-1:2	7.22.16	Not sealed		
337	8.8.16	Not sealed		
338	8.8.16	Keep sealed	CI-1 CI-3 CI-4 CI-6	
338-1	8.8.16	Keep sealed – names of Non-Parties, reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial and deposition testimony potential evidence		Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
338-2	8.8.16	Keep sealed	CI-7	Unseal in full.
338-3	8.8.16	Keep sealed – names of Non-Parties, reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial and deposition testimony potential evidence	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
338-4	8.8.16	Keep sealed – privacy interests and reliance on Protective order; names of Non-Parties, reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1;	CI-1 CI-2 CI-3 CI-4 CI-7	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.

DOC. #	DATE FILED	DEFENDANT'S POSITION	C/I ¹	PLAINTIFF'S POSITION
338-5	8.8.16	Previously released by Second Circuit	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal in full. Note: These pages of this deposition transcript were released by the Second Circuit without redactions.
338-6	8.8.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial and deposition potential evidence	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The deponent is not on the Non-Party notification list because he is a law enforcement officer.
338-7	8.8.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial and deposition testimony potential evidence.	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Keep sealed until Non-Party deponent (Doe 160) time to object expires. Note: Original Parties agree to keep sealed, but for different reasons.
338-8	8.8.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial and deposition testimony potential evidence.	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.

DOC. #	DATE FILED	DEFENDANT'S POSITION	C/I ¹	PLAINTIFF'S POSITION
338-9	8.8.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial and deposition testimony potential evidence.	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The Original Parties sent the Non-Party deponent (Doe 7) notice of unsealing, and the Non-Party deponent did not request excerpts.
338-10	8.8.16	No objection to unsealing		Unseal. Note: Original Parties agree.
353	8.10.16	Redact all Non-Party witness names and identifying information	CI-1 CI-3	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
375	8.17.16	Not sealed		
315	7.29.16	Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
316	7.29.16	Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.

DOC. #	DATE FILED	DEFENDANT'S POSITION	C/I ¹	PLAINTIFF'S POSITION
316-1	7.29.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial and deposition testimony potential evidence.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Keep sealed until Non-Party deponent (Doe 160) time to object expires. Note: Original Parties agree to keep sealed, but for different reasons.
316-2	7.29.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial and deposition testimony potential evidence. The Non-Party Notice sent to this Doe was returned as undelivered to defense counsel.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The Original Parties sent the Non-Party deponent (Doe 67) notice of unsealing, and the Non-Party deponent did not request excerpts.
316-3	7.29.16	Previously released by Second Circuit	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal in full. Note: These pages of this deposition transcript were released by the Second Circuit without redactions.
316-4	7.29.16	Previously released by Second Circuit	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal in full. Note: These pages of this deposition transcript were released by the Second Circuit without redactions.
316-5	7.29.16	Previously released by Second Circuit	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal in full. Note: These pages of this deposition transcript were released by the Second Circuit without redactions.

DOC. #	DATE FILED	DEFENDANT'S POSITION	C/I ¹	PLAINTIFF'S POSITION
316-6	7.29.16	Keep sealed – The parties agreed to appropriate redactions and the redacted version of the Order was filed at DE 264-1.	CI-1	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
316-7	7.29.16	Keep sealed – privacy interests and reliance on Protective order; names of Non-Parties, reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1;	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
316-8	7.29.16	Keep sealed any pages not previously released by Second Circuit – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witnesses in criminal case and exhibit is potential evidence.	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6	Unseal and redact only (1) names and identifying information of minors and (2) names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: Portions of this document were redacted and released by the Second Circuit. The redactions of the portions already released should match the Second Circuit redactions.
339	8.8.16	Keep sealed – privacy interests and reliance on Protective order; names of Non-Parties, reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1;	CI-1 CI-2 CI-3 CI-4	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.

DOC. #	DATE FILED	DEFENDANT'S POSITION	C/I ¹	PLAINTIFF'S POSITION
340	8.8.16	Keep sealed – privacy interests and reliance on Protective order; names of Non-Parties, reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1;	CI-1 CI-4	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
340-1	8.8.16	Keep sealed – in manner consistent with DE 1090-32	CI-1 CI-4	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The full version of this deposition transcript was unsealed by this Court on July 30, 2020, DE 1090-32. If this excerpt of the transcript is unsealed, it should be redacted in the same way as DE 1090-32, but the redactions of the names of Non-Parties whose time to object has expired should be removed.
340-3	8.8.16	Keep sealed – privacy interests and reliance on Protective order; names of Non-Parties, reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1;	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
340-4		Keep sealed – privacy interests and reliance on Protective order; names of Non-Parties, reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1;	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.

DOC. #	DATE FILED	DEFENDANT'S POSITION	C/I ¹	PLAINTIFF'S POSITION
340-5		Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal case and deposition potential evidence.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Keep sealed until Non-Party deponent (Doe 160) time to object expires. Note: Original Parties agree to keep sealed, but for different reasons.
340-6		Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial and deposition potential exhibit.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The deponent is not on the Non-Party notification list because he is a law enforcement officer.
340-7		Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; ; potential witness in criminal case and deposition potential evidence. Non-Party requested that name be kept under seal.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The Original Parties sent the Non-Party deponent (Doe 1) notice of unsealing, the Non-Party deponent requested excerpts, and the Non-Party deponent did not object to unsealing within two weeks of receiving the excerpts.

DOC. #	DATE FILED	DEFENDANT'S POSITION	C/I ¹	PLAINTIFF'S POSITION
340-8		Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; The Non-Party Notice sent to this Doe was returned as undelivered to defense counsel. The Non-Party Notice sent to this Doe was returned as undelivered to defense counsel.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The Original Parties sent the Non-Party deponent (Doe 67) notice of unsealing, and the Non-Party deponent did not request excerpts.
340-9	8.8.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal case and deposition potential evidence.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Keep sealed until Non-Party deponent (Doe 151) time to object expires. Note: Original Parties agree to keep sealed, but for different reasons.
368	8.12.16	Keep sealed – privacy interests and reliance on Protective order; names of Non-Parties, reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
369	8.12.16	Keep sealed – privacy interests and reliance on Protective order; names of Non-Parties, reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.

DOC. #	DATE FILED	DEFENDANT'S POSITION	C/I ¹	PLAINTIFF'S POSITION
369-1	8.12.16	Keep sealed – privacy interests and reliance on Protective order; names of Non-Parties, reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1;	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: This deposition transcript was unsealed on October 22, 2020, DE 1137-13. This document should be redacted in the same way as DE 1137-13, but the redactions of the names of Non-Parties whose time to object has expired should be removed.
369-2	8.12.16	Keep sealed – The parties agreed to appropriate redactions and the redacted version of the Order was filed at DE 264-1.	CI-1	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
369-3	8.12.16	Keep sealed – privacy interests and reliance on Protective order; names of Non-Parties, reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1;	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
369-4	8.12.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial and deposition potential exhibit. The Non-Party Notice sent to this Doe was returned as undelivered to defense counsel.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The Original Parties sent the Non-Party deponent (Doe 67) notice of unsealing, and the Non-Party deponent did not request excerpts.

DOC. #	DATE FILED	DEFENDANT'S POSITION	C/I¹	PLAINTIFF'S POSITION
369-5	8.12.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial and deposition potential exhibit.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Keep sealed until Non-Party deponent (Doe 160) time to object expires. Note: Original Parties agree to keep sealed, but for different reasons.
369-6	8.12.16	Release consistent with Second Circuit's redactions.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal subject to Second Circuit redactions. Note: These pages of this deposition transcript were released by the Second Circuit without redactions, except for page 59 which contains redactions of a minor's name.
369-7	8.12.16	Release consistent with Second Circuit	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal in full. Note: These pages of this deposition transcript were released by the Second Circuit without redactions.
369-8	8.12.16	Release consistent with Second Circuit	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal in full. Note: These pages of this deposition transcript were released by the Second Circuit without redactions.
369-9	8.12.16	Release consistent with Second Circuit	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal in full. Note: This document was released by the Second Circuit without redactions.
369-10	8.12.16	Keep sealed	CI-2 CI-6 CI-7	Unseal in full.

DOC. #	DATE FILED	DEFENDANT'S POSITION	C/I ¹	PLAINTIFF'S POSITION
369-11	8.12.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial and deposition testimony potential evidence.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The deponent is not on the Non-Party notification list because he is a law enforcement officer.
369-12	8.12.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial and deposition testimony potential evidence. Unknown whether received the Notice.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The Original Parties sent the Non-Party deponent (Doe 145) notice of unsealing, and the Non-Party deponent did not request excerpts.
369-13	8.12.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial and deposition testimony potential evidence. Unknown whether received the Notice	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The Original Parties sent the Non-Party deponent (Doe 155) notice of unsealing, and the Non-Party deponent did not request excerpts.
369-14	8.12.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial and deposition testimony potential evidence.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The Original Parties sent the Non-Party deponent (Doe 99) notice of unsealing, and the Non-Party deponent did not request excerpts.

DOC. #	DATE FILED	DEFENDANT'S POSITION	C/I ¹	PLAINTIFF'S POSITION
369-15	8.12.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial and deposition testimony potential evidence.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The Original Parties sent the Non-Party deponent (Doe 122) notice of unsealing, and the Non-Party deponent did not request excerpts.
369-16	8.12.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial and deposition testimony potential evidence.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: Non-Party deponent is deceased.
320	8.1.16	Keep redacted the names and identifying information of Ms. Maxwell and all Non-Parties; release of information in violation of Local Criminal Rule 23.1	CI-1 CI-3	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
321	8.1.16	Keep redacted the names and identifying information of Ms. Maxwell and all Non-Parties; release of information in violation of Local Criminal Rule 23.1		Retain redaction of email address.
321-1	8.1.16	Keep redacted the names and identifying information of Ms. Maxwell and all Non-Parties; release of information in violation of Local Criminal Rule 23.1	CI-1 CI-2 CI-3 CI-4 CI-6	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.

DOC. #	DATE FILED	DEFENDANT'S POSITION	C/I¹	PLAINTIFF'S POSITION
321-2	8.1.16	Keep redacted the names and identifying information of Ms. Maxwell and all Non-Parties; release of information in violation of Local Criminal Rule 23.1	CI-1 CI-2 CI-3 CI-4 CI-6	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
321-3	8.1.16	Keep redacted the names and identifying information of Ms. Maxwell and all Non-Parties; release of information in violation of Local Criminal Rule 23.1	CI-1 CI-2 CI-3 CI-4 CI-6	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
321-4	8.1.16	Keep redacted the names and identifying information of Ms. Maxwell and all Non-Parties; release of information in violation of Local Criminal Rule 23.1	CI-1 CI-2 CI-3 CI-4 CI-6	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
321-5	8.1.16	Keep redacted the names and identifying information of Ms. Maxwell and all Non-Parties; release of information in violation of Local Criminal Rule 23.1	CI-1 CI-2 CI-3 CI-4 CI-6	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
321-6	8.1.16	Keep redacted the names and identifying information of Ms. Maxwell and all Non-Parties; release of information in violation of Local Criminal Rule 23.1	CI-1 CI-2 CI-3 CI-4 CI-6	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
322	8.1.16	Not sealed		
323	8.1.16	Keep redacted the names and identifying information of Ms. Maxwell and all Non-Parties; release of information in violation of Local Criminal Rule 23.1	CI-1 CI-2 CI-3 CI-4 CI-6	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired
329	8.2.16	Not Sealed		

DOC. #	DATE FILED	DEFENDANT'S POSITION	C/T ¹	PLAINTIFF'S POSITION
335	8.8.16	No objection to unsealing. – Publicly available documents		Unseal but redact information about events when Plaintiff was minor child.
336	8.8.16	No objection to unsealing.		Unseal. Note: Original Parties agree.
336-1	8.8.16	No objection to unsealing.		Unseal. Note: Original Parties agree.
336-2	8.8.16	No objection to unsealing.		Unseal but redact information about events when Plaintiff was minor child.
336-3	8.8.16	No objection to unsealing		Unseal. Note: Original Parties agree.
380	8.18.16	No objection to unsealing – information based on publicly available documents		Unseal but redact information about events when Plaintiff was minor child.
381	8.18.16	No objection to unsealing.		Unseal. Note: Original Parties agree.
381-1	8.8.16	No objection to unsealing - Publicly available documents.		Keep sealed (information about events when Plaintiff was minor child).
381-2	8.8.16	No objection to unsealing - Publicly available documents.		Keep sealed (information about events when Plaintiff was minor child).
381-3	8.8.16	No objection to unsealing - – Publicly available documents.		Keep sealed (information about events when Plaintiff was minor child).
381-4	8.8.16	No objection to unsealing – Redacted version released by Second Circuit		Unseal redacted version released by Second Circuit. Note: Original Parties agree.

DOC. #	DATE FILED	DEFENDANT'S POSITION	C/I ¹	PLAINTIFF'S POSITION
381-5	8.8.16	No objection to unsealing – Redacted version released by Second Circuit		Unseal redacted version released by Second Circuit. Note: Original Parties agree.
381-6	8.8.16	No objection to unsealing - – Publicly available documents		Unseal but redact telephone numbers, email addresses, and addresses.
381-7	8.8.16	No objection to unsealing – Redacted version released by Second Circuit		Unseal redacted version released by Second Circuit. Note: Original Parties agree.
381-8	8.8.16	No objection to unsealing - Publicly available documents		Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
392	8.23.16	Keep Sealed – Information based on – Publicly available documents	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6	Unseal but redact information about events when Plaintiff was minor child.
393	8.23.16	Keep redacted the names and identifying information of Ms. Maxwell and all Non-Parties; release of information in violation of Local Criminal Rule 23.1Redact -	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
393-1	8.23.16	Unseal consistent with Second Circuit redactions	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal subject to Second Circuit redactions. Note: These pages of these deposition transcripts were all released by the Second Circuit without redactions, except for page 24 of the composite exhibit, where the Second Circuit redacted a minor's name.

DOC. #	DATE FILED	DEFENDANT'S POSITION	C/I ¹	PLAINTIFF'S POSITION
393-2	8.23.16	Release consistent with Second Circuit	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal in full. Note: This document was released by the Second Circuit without redactions.
393-3	8.23.16	Keep sealed – privacy interests and reliance on Protective order; names of Non-Parties, reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1;	CI-1 CI-2 CI-3 CI-4 CI-5 CI-7	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
393-4	8.23.16	Keep sealed – privacy interests and reliance on Protective order; names of Non-Parties, reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1;	CI-1 CI-2 CI-3 CI-4 CI-5 CI-7	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
400	8.25.16	Keep sealed – privacy interests and reliance on Protective order; names of Non-Parties, reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; Keep sealed	CI-1 CI-2 CI-3 CI-4	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
401	8.25.16	Keep sealed – privacy interests and reliance on Protective order; names of Non-Parties, reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; Keep sealed	CI-1 CI-2 CI-3 CI-4	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.

DOC. #	DATE FILED	DEFENDANT'S POSITION	C/I ¹	PLAINTIFF'S POSITION
401-1	8.25.16	Keep sealed – privacy interests and reliance on Protective order; names of Non-Parties, reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1;	CI-1 CI-2 CI-3 CI-4 CI-5	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
401-2	8.25.16	Keep sealed – privacy interests and reliance on Protective order; names of Non-Parties, reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1;	CI-1 CI-2 CI-3 CI-4 CI-5	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
401-3	8.25.16	Release consistent with Second Circuit	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal in full. Note: These pages of this deposition transcript were released by the Second Circuit without redactions.
401-4	8.25.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial and deposition testimony potential evidence.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Keep sealed until Non-Party deponent (Doe 160) time to object expires Note: Original Parties agree to keep sealed, but for different reasons.
401-5	8.25.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial and deposition testimony potential evidence.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The Original Parties sent the Non-Party deponent (Doe 1) notice of unsealing, the Non-Party deponent requested excerpts, and the Non-Party deponent did not object to unsealing within two weeks of receiving the excerpts

DOC. #	DATE FILED	DEFENDANT'S POSITION	C/I ¹	PLAINTIFF'S POSITION
401-6	8.25.16	<p>Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial and deposition potential evidence.</p> <p>The Non-Party Notice sent to this Doe was returned as undelivered to defense counsel.</p>	<p>CI-2 CI-3 CI-4 CI-5 CI-6 CI-7</p>	<p>Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.</p> <p>Note: The Original Parties sent the Non-Party deponent (Doe 67) notice of unsealing, and the Non-Party deponent did not request excerpts.</p>