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June 1, 2016

Via CM/ECF

Honorable Judge Robert W. Sweet District Court Judge United States District Court 500 Pearl Street New York, NY 10007

Re: Giuffre v. Maxwell,

Case no. 15-cv-07433-RWS – Regarding Protective Order

Dear Judge Sweet:

This is a letter motion to file Ms. Giuffre's Response in Opposition to Defendant's Motion to Compel Attorney-Client Communications and Attorney Work Product Materials and certain accompanying exhibits under seal pursuant to this Court's Protective Order (DE 62).

The Protective Order 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.

See Protective Order (DE 62) signed on March 17, 2016, at p. 4. The parties have designated certain documents confidential pursuant to the Protective Order; accordingly, Ms. Giuffre seeks leave to file the Response and certain related exhibits under seal.

Respectfully submitted,

Sigrid S. McCawley, Esq.

cc: Laura Menninger, via CM/ECF Jeffrey Pagliuca, via CM/ECF