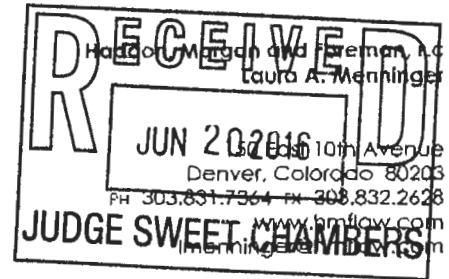




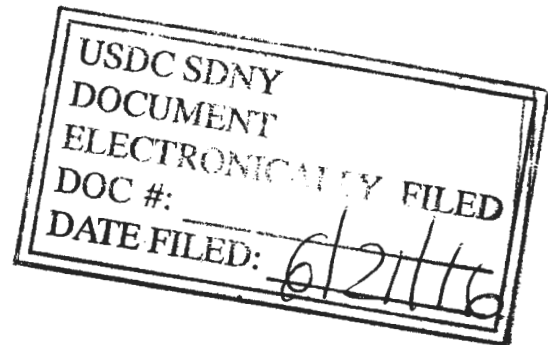
HADDON
MORGAN
FOREMAN



June 20, 2016

Via Facsimile (212) 805-7925

Hon. Robert W. Sweet
United States District Judge
United States District Court
Daniel Patrick Moynihan Courthouse
Southern District of New York
500 Pearl Street, Room 1940
New York, New York 10007-1312



Re: Giuffre v. Maxwell, 15-cv-07433-RWS

Dear Judge Sweet:

This is a letter motion to file under seal the following Motions, as well as Declarations and certain exhibits thereto, under seal pursuant to this Court's Protective Order (Doc. # 62):

- Defendant's Combined Memorandum of Law In Opposition to Extending Deadline to Complete Depositions and Motion for Sanctions for Violations of Rule 45;
- Motion to Reopen Deposition of Plaintiff Virginia Giuffre;
- Motion for Rule 37(b) &(c) Sanctions for Failure to Comply with Court Order and Failure to Comply with Rule 26(a).

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 (Doc. #62) signed on March 17, 2016 at 4. These Motions, Declarations and Exhibits contain content designated as Confidential by the parties pursuant to the Protective Order.

*So ordered
Sweet USDC
6.20.16*

Hon. Robert W. Sweet
June 20, 2016
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Ms. Maxwell therefore requests permission to file the Confidential information under seal.

Sincerely,

HADDON, MORGAN AND FOREMAN, P.C.

/s/ Laura A. Menninger
Laura A. Menninger

CERTIFICATE OF SERVICE

I certify that on June 20, 2016, I electronically served this *LETTER MOTION* via ELECTRONIC MAIL on the following:

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