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JUDGE SWEET CHAMBERS

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September 30, 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:

I am writing to report that the parties have resolved "Plaintiff's Motion for Court Approval of Plaintiff's Certification of Production," ECF #441, as follows:

1. Plaintiff agrees to continue with her previously undertaken attempts to obtain her medical records, via medical releases, from: (1) Health Fusion (the entity that maintains BlueCross/Blue Shield records); (2) Liverpool Hospital in Australia; (3) Australia Medicare and Australia Pharmaceutical Benefits Scheme; (4) Dr. Rudolfo Torres; and (5) Dr. Timothy Hartwig. Plaintiff will produce any records dated 1999 or after received in response to those releases. Plaintiff does not waive any objections to Defendant's use of the records and information therein.
2. In the event that additional medical or pharmaceutical records dated 1999 or after are revealed in the records identified in the items listed in paragraph 1, Plaintiff will execute necessary releases for any records that are requested by the Defendant. Plaintiff does not waive any objections to Defendant's use of the records and information therein.
3. Plaintiff has issued a release to obtain information from the Social Security Administration and will produce records obtained to Defendant.
4. In the event additional employment records are revealed in any records obtained in paragraph 3, above, Plaintiff will execute necessary authorizations or

*Hearing
vacated as moot
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releases. Plaintiff does not waive any objections to Defendant's use of the records and information therein.

5. Plaintiff has advised the Court that she continues to seek records regarding her email account from Microsoft and has paid a \$175 fee for release of her subscriber information. Plaintiff agrees to continue her efforts to obtain these records as represented to the Court in her Motion for Court Approval of Plaintiff's Certification of Production.

6. Defendant agrees that the Court's Order requiring certification of production, ECF #445, is satisfied by this agreement and the parties will schedule the Plaintiff's continued deposition consistent with the schedules of the Plaintiff and counsel of record.

7. The parties agree that the "Plaintiff's Motion for Court Approval of Plaintiff's Certification of Production," ECF #441, is now moot and request that the Court vacate the hearing scheduled for October 13, 2016.

Sincerely,

HADDON, MORGAN AND FOREMAN, P.C.

/s/ Jeffrey S. Pagliuca
Jeffrey S. Pagliuca

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CERTIFICATE OF SERVICE

I certify that on September 30, 2016, I electronically served this *LETTER TO THE COURT* via ELECTRONIC MAIL on the following:

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