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October 26, 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 request the Court continue the hearing currently scheduled on November 3, 2016 to November 10, 2016 because counsel for Ms. Maxwell are unavailable on November 3, 2016.

There are currently three motions scheduled for argument on November 3, 2016: Defendant's Motion to Compel Testimony of Jeffrey Epstein, ECF # 449; Plaintiff's Motion to Reopen Deposition, ECF # 446, and Plaintiff's Motion to Compel, ECF # 469.

As the Court is aware, the Plaintiff has also moved to compel the production of documents and testimony from Mr. Epstein by a separate pleading filed in the U.S. District Court for the Southern District of Florida. The "Plaintiff's Scaled Motion to Compel the Production of Documents and Testimony From Jeffrey Epstein" and Mr. Epstein's Opposition ("the Florida pleadings") were attached to Mr. Epstein's Response to the Motion were attached to Mr. Epstein's Response to ECF # 449, Defendant's Motion to Compel Testimony of Jeffrey Epstein. The pleadings are found at ECF # 473 (Response) and ECF # 474 (Declaration of Jack Alan Goldberger, exhibits A and B). The parties and Mr. Epstein have agreed that the issues raised by the Florida pleadings should be resolved by this Court along with Defendant's Motion to Compel Testimony of Jeffrey Epstein, ECF # 449. It is my understanding that Plaintiff has filed an unopposed motion to transfer the Florida pleadings to this Court.

Unfortunately, counsel for Ms. Maxwell are unavailable on November 3, 2016 as a

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result of previously scheduled court appearances in Colorado. All counsel, however, are available on November 10, 2016. I have conferred with counsel for the Plaintiff and Jack Goldberger, counsel for Mr. Epstein, who are not opposed to continuing the hearing from November 3, 2016 to November 10, 2016.

Respectfully Submitted,

HADDON, MORGAN AND FOREMAN, P.C.

/s/ Jeffrey S. Pagliuca
Jeffrey S. Pagliuca

CERTIFICATE OF SERVICE

I certify that on October 26, 2016, I electronically served this *LETTER TO THE COURT* via ELECTRONIC MAIL on the following:

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