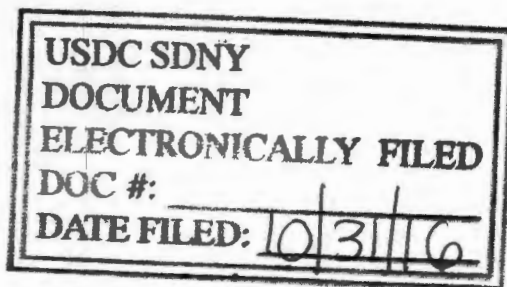


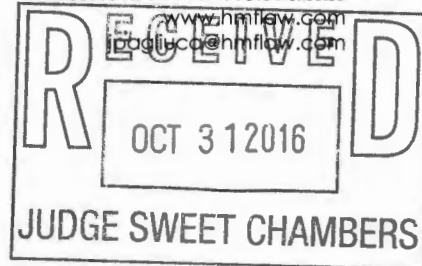


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October 28, 2016

Via Email

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 deadline to submit one of the defense rebuttal expert opinions by one business day from October 28, 2016 to October 31, 2016, because the expert is experiencing travel and technical difficulties and unable to complete his report in the time allotted. The extension is unopposed.

The defense is disclosing a total of three rebuttal expert opinions today. One of the defense experts, Dr. Phillip Esplin, has been traveling this week out of state for purposes of speaking at a conference. Due to his travel schedule, and some unforeseen technical difficulties regarding his inability to access email from his remote location, he is unable to complete his report by the close of business today, October 28. He is endeavoring to finish it over the weekend after he returns to his office.

Defense counsel has agreed not to read any of Plaintiff's rebuttal reports, nor to share them with any of our expert witnesses, until we have provided this final rebuttal report on Monday, October 31. No prejudice therefore exists as the delay will not result in a tactical advantage to either side. Dr. Esplin's deposition is tentatively scheduled more than a month from now, the week of November 28, 2016, and therefore Plaintiff will have ample time to review the report to prepare for his deposition.

I have conferred with counsel for Ms. Giuffre who has agreed to relief requested herein.

*So ordered
Sweet USDS
10.31.16*

Hon. Robert W. Sweet
October 28, 2016
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Respectfully Submitted,

HADDON, MORGAN AND FOREMAN, P.C.

/s/ Jeffrey S. Pagliuca

Jeffrey S. Pagliuca

CERTIFICATE OF SERVICE

I certify that on October 28, 2016, I electronically served this *LETTER TO THE COURT* via ELECTRONIC MAIL on the following:

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/s/ Nicole Simmons

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