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***By ECF***

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

*Re: Giuffre v. Maxwell*, No. 15 Civ. 7433 (RWS)

Dear Judge Sweet:

This firm represents Intervenor Professor Alan M. Dershowitz, and we write in response to the pending application of Julie Brown and the Miami Herald Media Company to intervene and unseal materials filed in court in the above-captioned matter. Intervenor Dershowitz supports the pending application. As this Court knows, Intervenor Dershowitz has been litigating to unseal materials from this case for nearly two years. Indeed, at this very moment, Intervenor's appeal of this Court's order denying his motion, *inter alia*, to unseal materials filed in this case is awaiting an argument date in the Second Circuit Court of Appeals.

Against that backdrop, Intervenor seeks to bring to this Court's attention his June 21, 2017 letter to Your Honor (ECF No. 922) (the "June 2017 Letter"). Last year, following the settlement of this action, Intervenor anticipated the possibility that this Court might be faced with an unsealing motion, or one to de-designate certain materials previously designated as "confidential" under the Protective Order in this case. Accordingly, in the June 2017 Letter, Intervenor called upon the Court, in the event of an unsealing order, to [REDACTED]

[REDACTED]

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[REDACTED] A copy of the June 2017 Letter, with attachments, is annexed hereto as Exhibit A.

In light of the pending motion to unseal the *entire* filed record in this case, Intervenor reiterates the request that he made on June 21, 2017, to wit: [REDACTED]

[REDACTED]

Intervenor Dershowitz thanks the Court for its consideration of the instant application.

Respectfully submitted,

/s/ Andrew G. Celli, Jr.

Andrew G. Celli, Jr.

c: Counsel for Plaintiff and Defendant (by Email)