

EXHIBIT B

PAUL G. CASSELL
S.J. Quinney College of Law at the University of Utah
383 S. University St.
Salt Lake City, UT 84112
Telephone: 801-585-5202
cassellp@law.utah.edu*

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Laura A. Menninger
Haddon, Morgan and Foreman, P.C.
150 East 10th Avenue
Denver, CO 80203
Viam email: lmenninger@hmflaw.com

Re: *Giuffre v. Maxwell*
Case no. 15-cv-07433-RWS – Regarding Protective Order

Dear Laura,

Thanks for your letter of July 6 regarding the protective order and ultimate destruction of the documents.

As you yourself note, paragraph 12's provisions take effect "at the conclusion of the case." As you are also aware, two appeals involving this case (and to which Ms. Giuffre has been named as a party) are currently pending in the Second Circuit. These two appeals involve some of the confidential documents that you are, apparently, proposing may need to be destroyed now.

Until those appeals have been resolved, it would be premature to begin implementing paragraph 12's provision.

We will contact you at the final conclusion of those two appeals to make appropriate arrangements.

Respectfully submitted,



Paul G. Cassell
for Ms. Virginia Giuffre

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