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July 30, 2020

VIA ECF

The Honorable Loretta A. Preska
District Court Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Giuffre v. Maxwell*,
Case No. 15-cv-7433-LAP

Dear Judge Preska,

I am in receipt of the redacted version of Ms. Menninger's letter to you earlier today which I received at 1:45 p.m. At 2:11 p.m. I emailed Ms. Menninger requesting a copy of the unredacted letter so that we could respond to her objections to our proposed redactions. We have not yet received those materials so I am not able to comment on them except as reflected in Ms. Menninger's letter itself. While I cannot determine the information in the redacted form, it may be that those pages are pages that the Second Circuit has already released and thus the name remained unredacted in the form set forth by the Second Circuit. Alternatively there could have been an error, but we are unable to make that determination at this point without the unredacted copy. I note that we had attempted to avoid burdening the court by requesting from Ms. Maxwell's counsel their proposed redactions so we could do a comparison, however, they never provided a copy of their redactions and therefore we were required to proceed without them. We began providing Ms. Maxwell's counsel with our proposed redactions on Saturday, July 25, 2020 but still have not received a set of redactions from Ms. Maxwell's counsel other than a few examples she provided via phone during our meet and confer of areas of testimony where she contended there should be additional redactions. We await the Court's guidance on how the Court would like us to proceed.

Sincerely,

/s/ Sigrid S. McCawley

Sigrid S. McCawley, Esq.

cc: Counsel of Record (via ECF)