



Haddon, Morgan and Foreman, P.C.
Laura A. Menninger

150 East 10th Avenue
Denver, Colorado 80203
PH 303.831.7364 FX 303.832.2628
www.hmflaw.com
LMenninger@hmflaw.com

January 12, 2022

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

Re: Defendant's Position re. Unsealing Documents Related to Non-Parties 17, 53,
54, 55, 56, 73, 93, and 151
Giuffre v. Maxwell, No. 15 Civ. 7433 (LAP)

Dear Judge Preska:

After careful review of the detailed objections submitted by Non-Party Does 17, 53, 54, 55, 73, 93 and 151, counsel for Ghislaine Maxwell writes to inform the Court that she does not wish to further address those objections. *See* Dkt. 1230 at 2.

Each of the listed Does has counsel who have ably asserted their own respective privacy rights. Ms. Maxwell therefore leaves it to this Court to conduct the appropriate review consistent with the Order and Protocol for Unsealing Decided Motions. Dkt. 1108 at 5 ("The Court will conduct a particularized review of the Sealed Materials and weigh the competing interests regardless whether it receives any Non-Party Objection.").

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Laura A. Menninger', with a large, stylized loop at the end.

Laura A. Menninger

CC: Counsel of Record *via* ECF