

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Virginia L. Giuffre,	⋮
Plaintiff,	
V.	
Ghislaine Maxwell,	15-cv-07433-RWS
Defendant.	
-----X	

Notice of Filing Under Seal Joint Proposed
Redacted Order Regarding Privilege

Defendant Ghislaine Maxwell, by and through her attorneys, hereby submits a proposed redacted version of this Court's April 15, 2016 Opinion concerning her assertion of privileges as directed by this Court. In that Opinion, this Court directed the parties to "jointly file a proposed redacted version of this Opinion...within two weeks of the date of receipt of this Opinion." *Id.* at 37. The proposed redactions submitted herewith are consistent with the Protective Order dated March 17, 2016. The proposed redacted version is being submitted under seal to the Court in the event the Court has a different view regarding redactions.

Ms. Maxwell respectfully submits that the identities of any person with whom she is or has been in a common interest agreement is not a matter for public record. The proposal redacts that individual's identifying information as well as that party's attorney's identity.

Plaintiff does not oppose this request.

Dated: April 29, 2016

Respectfully submitted,

/s/ Laura A. Menninger

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CERTIFICATE OF SERVICE

I certify that on April 29, 2016, I electronically served this *Notice of Filing Under Seal Joint Proposed Redacted Order Regarding Privilege* via ECF on the following:

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/s/ Nicole Simmons

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