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March 30, 2020

By ECF

The Honorable Loretta A. Preska
United States District Judge
Southern District of New York
500 Pearl Street, Room 2220
New York, NY 10007-1312

Re: *Giuffre v. Maxwell*, 15 Civ. 07433 (LAP)

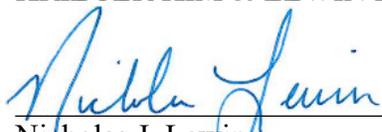
Dear Judge Preska:

We write on behalf of a non-party, John Doe, in response to the parties' submissions, dated March 26, 2020 (DE 1037; DE 1038), and in advance of the conference scheduled for March 31, 2020, *see* Order, dated Mar. 30, 2020, DE 1039, at 1; those submissions regarded additional changes to the protocol for notification of non-parties of the potential unsealing of certain filed documents. Non-party John Doe concurs with the modifications proposed by the defendant, for the reasons set forth in her submissions. *See* Defendant's Letter dated Mar. 26, 2020, DE 1037, at 1-2.

We respectfully propose one additional change to the protocol. In light of the extraordinary challenges, logistical and otherwise, presented by the ongoing coronavirus/COVID-19 pandemic – as have been formally recognized by this District, *see, e.g., In Re: Coronavirus/COVID-19*, 20-mc-00173 (S.D.N.Y.) – we submit that it is necessary and appropriate to provide at least non-parties with additional accommodations to meet the deadlines and requirements presently provided for under the protocol.

To that end, we propose the following: that paragraph 2(c) be revised to provide 30 days (rather than 14 days) for non-parties to submit a request for excerpts; that the first sentence of paragraph 2(f) be revised to reflect the same 30-day deadline; and that paragraph 2(d) be similarly revised to provide 30 days (rather than 14 days) for non-parties to submit an objection to unsealing/unredacting and 14 days (rather than 7 days) for non-parties to file a reply in support of their position.

Respectfully Submitted,
KRIEGER KIM & LEWIN LLP

By: 
Nicholas J. Lewin
Paul M. Krieger

cc (by ECF): All counsel of record