



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

July 1, 2020

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

Re: Motion to File Under Seal  
*Giuffre v. Ghislaine Maxwell*, No. 15 Civ. 7433 (LAP)

Dear Judge Preska:

This is a letter motion seeking leave to permit Ms. Maxwell to file a redacted Reply In Support of Her Objections to Unsealing Sealed Materials and to file under seal Exhibits A-D thereto.

The Protective Order governing this case states:

Whenever a party seeks to file any document or material containing CONFIDENTIAL INFORMATION with the Court in this matter, it shall be accompanied by a Motion to Seal pursuant to Section 6.2 of the Electronic Case Filing Rules & Instructions for the Southern District of New York.

Doc. # 62 at 4. The Reply and Exhibits A-D contain information deemed CONFIDENTIAL by the parties pursuant to the Protective Order. References to and discussion of specific CONFIDENTIAL materials are necessary to support Ms. Maxwell's request that these materials remain under seal.

Ms. Maxwell intends to file the redacted version of the Reply publicly on ECF and seeks leave only to file the unredacted version and Exhibits A-D under seal.

Respectfully submitted,

Laura A. Menninger

CC: Counsel of Record *via* ECF