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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,

Plaintiff submits this response to Defendant Ghislaine Maxwell's August 10, 2020, letter. Dkt. 1100. By order dated August 3, 2020, the Court directed the parties to submit letters outlining the parties' "suggestions for streamlining the unsealing process" and "their proposed next set of docket entries to be reviewed for potential unsealing." Dkt. 1096. Maxwell's response, however, included an unsolicited request for a "stay of the unsealing process for approximately three weeks," based on the vague assertion that, "[o]n Friday, August 7, 2020, counsel for Ms. Maxwell learned of critical new information." Dkt. 1100 at 1-2. The Court should reject Maxwell's request for a stay, which she made without conferring with Plaintiff beforehand, outright.

Maxwell's decision to request a stay based solely on vague allusions to "critical new information" illustrates her disregard for the Court's time, as well as her willingness to engage in dilatory conduct to thwart the unsealing process. *See* Dkt. 1087 at 3 n.3. Absent any description of what her "critical new information" is, the Court should deny Maxwell's request without prejudice to renewal. Any renewed request for a stay should be accompanied by a coherent explanation of how any "new information" she received via discovery in her criminal action justifies interfering with the unsealing process that the Second Circuit ordered over a year ago.

For the foregoing reasons, the Court should proceed with the unsealing process, set a briefing schedule for the next set of sealed motions, and order the Original Parties to serve the remaining Non-Parties with Notice, as outlined in Plaintiff's response to the Court's August 3 order. Dkt. 1099.

Sincerely,

/s/ Sigrid S. McCawley
Sigrid S. McCawley, Esq.