

LAW OFFICES OF

Aidala, Bertuna & Kamins, P.C.

ARTHUR L. AIDALA
MARIANNE E. BERTUNA
HON. BARRY KAMINS (RET.)
JOHN S. ESPOSITO
MICHAEL T. JACCARINO
IMRAN H. ANSARI
ANDREA M. ARRIGO
DIANA FABI SAMSON

SENIOR COUNSEL
LOUIS R. AIDALA
JOSEPH P. BARATTA

546 FIFTH AVENUE

NEW YORK, NY 10036

TELEPHONE: (212) 486-0011

FACSIMILE: (212) 750-8297

WWW.AIDALALAW.COM

8118-13TH AVENUE
BROOKLYN, NEW YORK 11228
TEL: (718) 238-9898
FAX: (718) 921-3292

OF COUNSEL
JOSEPH A. BARATTA
ANTOINETTE LANTERI
WILLIAM R. SANTO
PETER S. THOMAS
LAWRENCE SPASOJEVICH

October 22, 2020

VIA ECF

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

Re: ***Giuffre v. Maxwell, Case No. 15-Civ-7433-LAP***

Dear Judge Preska,

Intervenor/Nonparty Alan Dershowitz (hereinafter "Professor Dershowitz") respectfully requests that all redactions of his name, in the unsealed materials posted on the docket on this date (Dkt. No. 1137), be unredacted. Professor Dershowitz particularly notes, having now reviewed the deposition transcript of Ghislaine Maxwell, as filed by Sigrid McCawley of Boies Schiller Flexner LLP on behalf of Virginia Giuffre, that his name appears multiple times within the transcript, but has been subject to redaction. Professor Dershowitz, however, desires just the opposite - and requests that his name be fully displayed in the transcript where it appears.

As the "John Does" and other nonparties have been afforded the ability to enjoy the cloak of confidentiality gained by redaction, Professor Dershowitz, who has tirelessly advocated for full transparency and fought for the unsealing and disclosure of material and information in this case, should be afforded the ability to have his name displayed where it appears, without redaction, as he so strongly desires. As Professor Dershowitz has continually stated: He has nothing to hide.

Wherefore, we respectfully request that this Court issue an Order directing Virginia Giuffre to refile the materials contained in Dkt. No. 1137 with Professor Dershowitz's name unredacted, or in the alternative, permit Professor Dershowitz to file the aforementioned documents himself, with his name identified.

Respectfully Submitted,


Imran H. Ansari, Esq.

CC: Professor Alan Dershowitz
Howard Cooper, Esq.
Arthur Aidala, Esq.

All Counsel of Record via ECF