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August 8, 2022

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. 7433 (LAP)

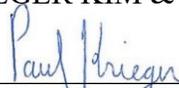
Dear Judge Preska:

We write on behalf of non-party John Doe in response to Movant-Intervenor TGP Communications, LLC, d/b/a The Gateway Pundit's ("TGP's") motion to intervene and unseal materials. *See* DEs 1258–59. TGP seeks to intervene for the purpose of moving to unseal and make public a hypothetical set of documents that TGP speculates identify a group of non-parties in this action who allegedly “abused girls trafficked by Jeffrey Epstein and Defendant Maxwell.” *See* DE 1258, at 1. The Court should deny TGP's motion to intervene and unseal.

This Court has implemented a carefully calibrated unsealing protocol that advances Your Honor's individualized review of each sealed docket entry. *See e.g.*, DEs 1034, 1044, 1053, 1108, 1157, 1230. That protocol, which was first put in place more than two years ago, balances the presumption of public access to judicial documents against the privacy, reputational, and other countervailing interests that support the continued sealing of certain of the previously sealed materials in this case. *See id.* TGP's motion seeks to discard this protocol and thwart its carefully calibrated process and objectives. And the motion offers no reason to do that. To the contrary, it merely rehashes certain arguments, conjecture, and hyperbole that have been previously asserted in various efforts to unseal the docket in this case, and that the Court has fully considered and rejected. TGP's brief fails to point to any new facts, circumstances, or changes in the law or even this case that warrant the Court's deviation from the process that it previously set out and to which the Court, the parties, and non-parties have endeavored to adhere.

Accordingly, TGP's request to intervene and unseal should be denied.

Respectfully Submitted,
KRIEGER KIM & LEWIN LLP

By: 

Nicholas J. Lewin
Paul M. Krieger

cc (by ECF): *Maxwell* Counsel of Record (15 Civ. 7433 (LAP))