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October 26, 2023

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,

The Parties, the Miami Herald, and Doe 107 write in response to the Court's August 24, 2023, order. ECF No. 1306. Based on counsel's representations concerning Doe 107's safety in her current country, the Parties and the Miami Herald consent to redacting Doe 107's name and any personally identifying information in the docket entries that the Court previously ordered unsealed. Giuffre's and the Miami Herald's consent to such redactions is based on circumstances specific to Doe 107 and does not extend to other purported victims living in countries without the same risks of physical harm.

The Parties therefore respectfully request the Court's permission to maintain the redactions to Doe 107's name and personally identifying information.

Sincerely,

/s/ Sigrid S. McCawley
Sigrid S. McCawley
Counsel for Plaintiff

/s/ Richard Levitt
Richard Levitt
Counsel for Doe 107

/s/ Laura Menninger
Laura Menninger
Counsel for Defendant

/s/ Christine N. Waltz
Christine N. Waltz
Counsel for Miami Herald

cc: Counsel of Record (via ECF)

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