

BOIES, SCHILLER & FLEXNER LLP

401 EAST LAS OLAS BOULEVARD • SUITE 1200 • FORT LAUDERDALE, FL 33301-2211 • PH. 954.356.0011 • FAX 954.356.0022

Meredith L. Schultz, Esq.
Email: mschultz@bsfllp.com

May 31, 2016

Via CM/ECF

Honorable Judge Robert W. Sweet
District Court Judge
United States District Court
500 Pearl Street
New York, NY 10007

Re: *Giuffre v. Maxwell*,
Case no. 15-cv-07433-RWS – Regarding Protective Order

Dear Judge Sweet:

This is a letter motion to file Ms. Giuffre's Response in Opposition to Defendant's Motion to Compel Non-Privileged Documents and certain accompanying exhibits under seal pursuant to this Court's Protective Order (DE 62).

The Protective Order 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.

See Protective Order (DE 62) signed on March 17, 2016, at p. 4. Defendant has designated documents produced by Defendant as confidential. Ms. Giuffre takes no position at this time on whether Defendant's designations are proper. Because of the Protective Order, however, Ms. Giuffre believes that she cannot presently produce or reference such documents in public court filings. Accordingly, she seeks leave to file the Response and certain related exhibits under seal.

Respectfully submitted,



Meredith L. Schultz, Esq.

cc: Laura Menninger, via CM/ECF
Jeffrey Pagliuca, via CM/ECF