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June 28, 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 Reopen Plaintiff's Deposition 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. The parties have designated certain documents confidential pursuant to the Protective Order; accordingly, Ms. Giuffre seeks leave to file the Response and certain related exhibits under seal.

Respectfully submitted,



Meredith Schultz, Esq.

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