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July 18, 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 improper letter motion to strike Plaintiff Virginia Giuffre's Motion for an Adverse Inference Instruction Pursuant to Rule 37(B), (E), and (F), Fed. R. Civ. P., 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.

Numerous materials have been marked as confidential in this case. As Ms. Giuffre's Motion for an Adverse Inference Instruction Pursuant to Rule 37(b), (e), and (f), Fed. R. Civ. P., and certain accompanying exhibits contain material that the parties have designated as confidential, she seeks leave to file it under seal.

Respectfully submitted,



Meredith Schultz, Esq.

cc: Laura Menninger and Jeffrey Pagliuca via CM/ECF