

United States District Court
Southern District of New York

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

**MOTION FOR PROTECTIVE ORDER AND MOTION FOR THE COURT TO DIRECT
DEFENDANT TO DISCLOSE ALL INDIVIDUALS TO WHOM DEFENDANT HAS
DISSEMINATED CONFIDENTIAL INFORMATION**

Plaintiff, Ms. Giuffre, by and through her undersigned counsel, hereby files this Motion for Protective Order and Motion for the Court to Direct Defendant to Disclose All Individuals to Whom Defendant has Disseminated Confidential Information pursuant to this Court's Protective Order (DE 62), wherein the Court allowed various documents to be maintained as confidential. [REDACTED]

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faith basis for such designation, and that disclosure of such information to persons other than those permitted access to such material would cause a privacy harm to the designating party.” Protective

Order at ¶ 8. The Order continues:

A party may object to the designation of particular CONFIDENTIAL INFORMATION by giving written notice to the party designating the disputed information. The written notice shall identify the information to which the objection is made. If the parties cannot resolve the objection within ten (10) business days after the time the notice is received, it shall be the obligation of the party designating the information as CONFIDENTIAL to file an appropriate motion requesting that the Court determine whether the disputed information should be subject to the terms of the Protective Order. If such a motion is timely filed, the disputed information shall be treated as CONFIDENTIAL under the terms of this Protective Order until the Court rules on the motion. If the designating party fails to file such a motion within the prescribed time, the disputed information shall lose its designation as CONFIDENTIAL and shall not thereafter be treated as CONFIDENTIAL in accordance with this Protective Order. In connection with a motion filed under this provision, the party designating the information as CONFIDENTIAL shall bear the burden of establishing that good cause exists for the disputed information to be treated as CONFIDENTIAL.

Protective Order at ¶ 11.

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Respectfully Submitted,

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⁴ This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah for this private representation.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 8, 2016, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I also certify that the foregoing document is being served to all parties of record via transmission of the Electronic Court Filing System generated by CM/ECF.

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