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 Schultz, Esq. Email: mschultz@bsfllp.com

August 8, 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 Plaintiff's Supplement to Motion For Adverse Inference Instruction Based on New Information 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 Plaintiff's Supplement to Motion For Adverse Inference Instruction Based On New Information and certain accompanying exhibits contain material that the parties have designated as confidential, she seeks leave to file it under seal.

Respectfully submitted,

Mud. Ih Schulk

Meredith Schultz, Esq.

cc: Laura Menninger and Jeffrey Pagliuca via CM/ECF