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Sigrid S. McCawley, Esq.

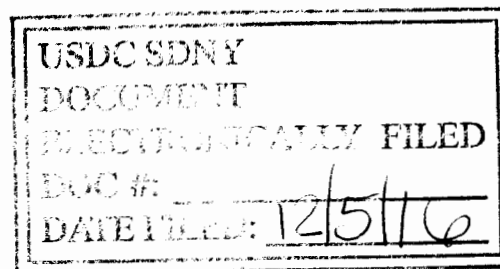
E-mail: smccawley@bsfllp.com

November 30, 2016

VIA EMAIL & FACSIMILE [212-805-7925]

Honorable Judge Robert W. Sweet
District Court Judge
United States District Court
500 Pearl Street
New York, NY 10007
SweetNYSDChambers@nysd.uscourts.gov

Re: *Giuffre v. Maxwell*,
Case No.: 15-cv-07433-RWS



Dear Judge Sweet:

The parties are requesting a modification to the expert deposition schedule to ensure completion of four expert depositions. The parties are in agreement with the following proposed changes.

The Scheduling Order provides that expert deposition should be completed by November 30, 2016. The Plaintiff is requesting a two (2) day extension of time on the schedule for completing the Defendant's expert depositions in this matter. Accordingly, we request permission to conclude the Defendant's expert depositions on Friday December 2, 2016.

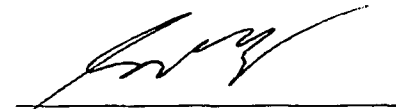
In addition, the Defendant is requesting that the Court allow for additional time to complete the depositions of one expert designated by the Plaintiff as a rebuttal expert, William Chandler and a forensic handwriting examiner, designated by the Plaintiff, Dianne Flores. It has not been possible to schedule these depositions along with the nine (9) other depositions that have occurred or will be occurring in New York, San Francisco, Tallahassee, and London from November 8, 2016 to December 2, 2016. Counsel has been attempting to schedule these depositions at a time when other activity, such as another deposition or court appearance is occurring to save on travel costs and legal fees. We request that the Court authorize an extension of time to December 29, 2016 to complete these two depositions.

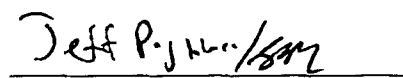
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BOIES, SCHILLER & FLEXNER LLP

Honorable Judge Sweet
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Respectfully submitted,



Sigrid S. McCawley, Esq.
Counsel for Plaintiff

Jeff Pagliuca, Esq.
Counsel for Defendant

SSM:akc

cc: Counsel of Record