

Haddon, Morgan and Foreman, P.C Laura A. Menninger

150 East 10th Avenue Denver, Colorado 80203 PH 303.831.7364 FX 303.832.2628 www.hmflaw.com LMenninger@hmflaw.com

November 12, 2019

Honorable Loretta A. Preska United States District Court Southern District of New York 500 Pearl Street New York, NY 10007

Re: October 28, 2019 Order (Doc.998)

Giuffre v. Ghislaine Maxwell, No. 15 Civ. 7433 (LAP)

Dear Judge Preska:

Pursuant to this Court's Order of October 28, 2019 (Doc.998) at paragraph 1, Ms. Maxwell hereby submits her list of motions that were decided in this case (by docket number) together with the docket numbers of the motion papers associated with each such motion.

Counsel for Ms. Maxwell organized her list beginning with the motion that was decided, together with the docket number and date the motion was decided. Below the motion are all of the associated motion papers. Also included are which of the motions and associated papers were redacted or sealed.

Despite extensive conferrals with Plaintiff's counsel, the parties were unable to reach agreement on two motions. Ms. Maxwell submits that the motions associated with docket entries 468 and 567 were never resolved by the Court and has omitted those motions from her list. With regard to 468, the Court specifically directed the parties to meet and confer and then "advise me of any issues that remain." With regard to DE 567, the hearing on April 5, 2017 covered a wide range of topics. The transcript of the hearing reveals that the issues raised by DE 567 were never resolved.

Ms. Maxwell seeks leave of the Court to submit her list under seal because some of the contents thereto contain references to sealed or redacted materials.

Very truly yours,

Laura A. Menninger

CC: Counsel of Record via ECF