

Michael C. Miller
212 506 3955
mmiller@steptoe.com



1114 Avenue of the Americas
New York, NY 10036
212 506 3900 main
www.steptoel.com

VIA ECF

October 3, 2017

Hon. Robert W. Sweet
U.S. District Judge
United States District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: ***Giuffre v. Maxwell***,
15-cv-7433-RWS - Regarding Protective Order

Dear Judge Sweet:

This is a letter motion, pursuant to this Court's Protective Order (Dkt 62) and the Southern District of New York Electronic Case Filing Rules & Instructions 6.2, for leave to file under seal Proposed Intervenor's Jeffrey Epstein's and Lesley Groff's ("Intervenor's") Memorandum of Law in Support of Intervenor's Motion for Leave to Intervene and Modify the Protective Order (the "Motion to Modify"). For the reasons set forth in the Motion to Modify, Intervenor's seek to modify the Protective Order in the *Giuffre* Matter in order to allow them to use evidence produced in the *Giuffre* Matter in support of a motion to dismiss another action against Intervenor's, *Jane Doe 43 v. Epstein*, No. 17 Civ. 616, which is based on allegations similar to those made in the *Giuffre* Matter. The evidence at issue was produced by Jane Doe 43, a non-party in the *Giuffre* Matter. Judge Koeltl, before whom the *Jane Doe* Matter is pending, instructed us to seek leave from this Court to modify the Protective Order in the *Giuffre* Matter.

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 (Dkt 62) signed on March 17, 2016, at p. 4. In order to demonstrate to the Court why the Protective Order should be modified, Intervenor's have cited to and quoted from

Hon. Robert W. Sweet
October 3, 2017
Page 2



documents designated as Confidential Information in the *Giuffre* Matter. Under the Protective Order, Intervenors cannot presently produce or reference Confidential Information in public court filings. Accordingly, Intervenors seek leave to file their Motion to Modify under seal.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael C. Miller".

Michael C. Miller

cc: All parties of record in the *Giuffre* Matter, via ECF
Counsel for Jane Doe 43, via e-mail