

**RANDAZZA**  
LEGAL GROUP

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July 10, 2019

Via CM/ECF

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

**Re: *Giuffre v. Maxwell, Case No. 15-cv-7433***  
***Response to Letter Motion (Doc. No. 970)***

Dear Judge Preska,

We represent Intervenor Michael Cernovich d/b/a Cernovich Media and oppose the letter-motion of Ms. Maxwell (Doc. No. 970) to adjourn the July 11 Conference.

Although Ms. Giuffre opposed our efforts to unseal, we are pleased to join her in exposing these Jeffrey Epstein-related documents as quickly as possible. Thus, we object to the motion to adjourn. Your Honor is new to the case, and we want to ensure the Court is fully prepared to unseal the record without delay once the mandate issues.

Though Ms. Maxwell is considering filing a petition for rehearing, we believe it highly unlikely such petition would be successful as the Second Circuit panel directly followed governing precedent. Ms. Maxwell otherwise appears to agree that the Court is authorized to hold the conference notwithstanding the pendency of the mandate. There should be no further artificial delay in unsealing the documents.

Of the dates proposed, we are otherwise available August 6, 7, 14, 15, 16, and the morning of the 8th. Thank you for your attention to this matter.

Sincerely,



Counsel for Intervenor Michael Cernovich