

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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VIRGINIA L. GIUFFRE,
 Plaintiff,
 v.
 GHISLAINE MAXWELL,
 Defendant.

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15-cv-07433-LAP

Ms. Maxwell’s Objections to Unsealing Docket Entries 143, 173, and 199 and to Unsealing Docket Entries 164 and 230 at This Time.

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Defendant Ghislaine Maxwell, through her counsel and pursuant to this Court's Order and Protocol for Unsealing Decided Motions, DE 1044, as clarified by DE 1053, objects to the unsealing of the Sealed Items contained in:

- DE 143 (and related DEs 142, 144, 144-1, 149, 150, 150-1, 151, 152, 153, and 153-1);
- DE 172 (and related DEs 171, 173, 173-1, 189, 190, 190-1, 202, 203, 204-1, 211, 212, 212-1, and 224) and;
- DE 199 (and related DEs 200, 200-1, 228, 229, 229-1, 284, 249, and 249-1).

The reasons for her objections are stated in her accompanying memorandum of law.

Ms. Maxwell, does not object to the potential unsealing of the Sealed Items contained in DEs 164 and related DEs 165, 165-8, 185-3, 185-11, 185-14, 185-15 or DE 230 and related DEs 235, 235-5, 235-7, 235-11, 235-13 at a future date. However, unsealing of these Sealed Items would be premature at this time because multiple Non-Party Does are referenced in these items, as described in the accompanying memorandum of law, and should be provided Notice and an opportunity to object pursuant to the Protocol.

Dated: June 10, 2020.

Respectfully submitted,

/s/Jeffrey S. Pagliuca

Laura A. Menninger (LM-1374)

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CERTIFICATE OF SERVICE

I certify that on June 10, 2020, I electronically served this *Ms. Maxwell's Objections to Unsealing Docket Entries 143, 173, and 199 and to Unsealing Docket Entries 164 and 230 at This Time*. via ECF on the following:

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