



July 30, 2020

**VIA ECF**

The Honorable Loretta A. Preska  
District Court Judge  
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-LAP**

Dear Judge Preska,

As a follow up to my letter from earlier today, we are now in receipt of the unredacted version of Ms. Menninger's letter alleging that we made errors in our redactions. First, Ms. Menninger claims that we erred in the redaction of [REDACTED] by redacting names at [REDACTED] but not at [REDACTED]. But [REDACTED] is presently publicly available on the docket with no redactions. Accordingly we did not redact what is already publicly available. Second, although we disagree that the word [REDACTED] that was not redacted on [REDACTED] identifies the nonparty at issue, we will agree to redact the word [REDACTED] in an abundance of caution. Third, we disagree with the allegation that there is an error in the redactions on [REDACTED].

As to the remainder of the letter, we fundamentally disagree with Ms. Menninger's objections to our redactions ([REDACTED]) because they do not involve a nonparty's identity or testimony as to any specific conduct in accordance with the Court's Order. We are of course not in a position to provide our views on Ms. Menninger's redactions because she has still not provided us with a set of the documents that are due to be released today.

Again, Plaintiff stands ready to file the documents that this Court unsealed on July 23, 2020 at the Court's direction.

Sincerely,

/s/ Sigrid S. McCawley \_\_\_\_\_

Sigrid S. McCawley, Esq.

cc: Counsel of Record (via ECF)