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August 12, 2020

Via ECF

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

**Re: INTERVENORS' LETTER IN RESPONSE TO MAXWELL'S LETTER
(DKT. 1100)
Giuffre v. Maxwell, Case No. 15-cv-7433-LAP**

Dear Judge Preska:

Intervenors Julie Brown and Miami Herald Media Co. respectfully submit this letter in response to Ghislaine Maxwell's letter dated August 10, 2020 (Dkt. 1100), in which she seeks a stay of the sealing process based on "critical new information."

Ms. Maxwell has made multiple efforts to stall this litigation and prevent the disclosure of documents to the public. Her August 10, 2020 letter is more of the same: It fails to offer a reasoned basis to support her request for a stay and instead says that the Court should trust her. This is wholly insufficient and the Court should deny Ms. Maxwell's request.

In addition to asking for a three-week stay, Ms. Maxwell also seeks to institute a blanket one-week stay of every unsealing decision by this Court, without offering any justification for doing so. (*See* Dkt. 1100, at 3.) The decision to grant a stay requires a case-by-case analysis; stays should not be incorporated into the unsealing process as a matter of right.

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Intervenors respectfully request that this Court deny Ms. Maxwell's request for a three-week stay, as well as any other request by Ms. Maxwell to unnecessarily delay the unsealing of the records in this case.

Sincerely yours,
HOLLAND & KNIGHT LLP

/s/ Christine N. Walz

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