UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

Case No.: 15-cv-07433-LAP

Virginia L. Giuffre, Plaintiff, v. Ghislaine Maxwell, Defendant.

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THE GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS' NOTICE OF EX PARTE MOTION TO INTERVENE AND FOR CONFIDENTIAL ACCESS TO JUDICIAL RECORDS AND DISCOVERY DOCUMENTS

PLEASE TAKE NOTICE THAT, upon the pleadings and papers in this matter, the

accompanying Memorandum of Law, and the exhibit annexed thereto, Proposed Intervenor the

Government of the United States Virgin Islands (the "USVI") respectfully moves this Court,

before the Honorable Loretta A. Preska, for an order pursuant to Federal Rule of Civil Procedure

24 granting the USVI's motion to intervene and for confidential access to judicial records and

discovery documents. The grounds for this motion are set forth in the accompanying

memorandum of law.

Dated: September 1, 2020

Respectfully submitted,

<u>/s/ William H. Narwold</u> William H. Narwold, Esq. Motley Rice LLC One Corporate Center 20 Church Street, 17th Floor Hartford, CT 06103 Tel: 860-882-1676 Fax: 860-882-1682 Email: bnarwold@motleyrice.com

Counsel of Record for Proposed Intervenor Government of the United States Virgin Islands

CERTIFICATE OF SERVICE

I certify that on September 1, 2020, I electronically served this Notice of Ex Parte Motion to Intervene and for Confidential Access to Judicial Records and Discovery Documents, and all papers submitted in support thereof, via ECF upon counsel of record for all parties.

> <u>/s/ William H. Narwold</u> William H. Narwold