

December 8, 2022

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,

Plaintiff writes in response to Doe 171's December 8, 2022, letter. Dkt. 1292. For the reasons set forth in Plaintiff's and the Miami Herald's December 7 responses (Dkts. 1289 and 1290), Doe 171's motion should be denied without the need for a conference.

Doe 171 claims that "briefs submitted . . . in the Second Circuit—contain information that Doe 171 is presently fighting and exercising her appellate rights to keep under seal." Dkt. 1292. To be clear, however, no one has filed anything revealing the contents of the judicial documents at issue in the Court's November 18 ruling. Doe 171 is instead referring to quotations of the Court's statements that identify her by name and explain that allegations about Doe 171 and her relationships with Jeffrey Epstein and Ghislaine Maxwell are already public. Doe 171 already included her request to retroactively redact a public transcript of a public hearing in her December 5 motion, Dkt. 1285 at 5, and her most recent filing yet again fails to provide any basis for such a request.

Sincerely,

/s/ Sigrid S. McCawley

Sigrid S. McCawley, Esq.

cc: Counsel of Record (via ECF)