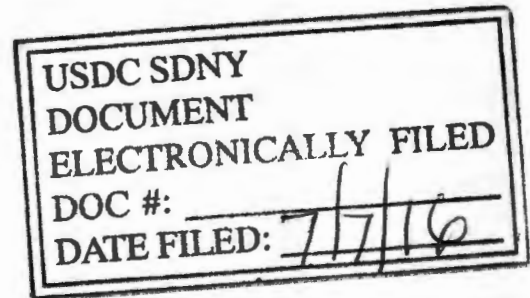


June 30, 2016

Via Facsimile (212) 805-7925

Hon. Robert W. Sweet
United States District Judge
United States District Court
Daniel Patrick Moynihan Courthouse
Southern District of New York
500 Pearl Street, Room 1940
New York, New York 10007-1312



Re: *Giuffre v. Maxwell*, 15-cv-07433-RWS

Dear Judge Sweet:

I write to request a brief 3-day extension of time to file Ms. Maxwell's Reply in Support of her Motions to Re-open Plaintiff's Deposition and for Rule 37(b) and (c) Sanctions until July 8, 2016 (the "Motions"). Counsel for Ms. Maxwell conferred with Mr. Brad Edwards, counsel for Plaintiff, regarding this request but has not received any response from him regarding Plaintiff's position.

Plaintiff filed her Responses to the Motions during the evening of June 28, 2016. Pursuant to Local Rule 6.1 and 6.4, Ms. Maxwell's replies therefore are due on July 5, 2016. Additionally, on June 29, 2016, Plaintiff disclosed approximately 800 new pages of documents. It is unclear without review whether any of these documents relate to the Motions.

Both attorneys representing Ms. Maxwell have pre-existing and long-standing vacation plans from June 30 through July 4th in areas that do not have internet or cellular connections. Counsel requests a brief extension of the period to Reply to afford counsel the opportunity to adequately review and respond to Plaintiff's Responses as well as to review the new 800 pages of disclosures.

The defense has not previously requested an extension regarding these Motions and has made every effort to brief all other motions in this case on a timely basis. The defense does not believe that Plaintiff will be prejudiced by this request. Ms. Maxwell respectfully requests an additional 3 days time until July 8 to file her replies in support of her Motions.

So ordered
Sweet USDJ
7-5-16

Hon. Robert W. Sweet
June 30, 2016
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Sincerely,

HADDON, MORGAN AND FOREMAN, P.C.

/s/ Laura A. Menninger
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