

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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VIRGINIA L. GIUFFRE,

Plaintiff,

- against -

GHISLAINE MAXWELL,

Defendant.

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Case No. 15-cv-7433 (RWS)

**NOTICE OF MOTION TO INTERVENE AND UNSEAL**

**PLEASE TAKE NOTICE**, that upon the memorandum of law in support of proposed intervenors Julie Brown and the Miami Herald Media Company's Motion to Intervene and Unseal, dated April 6, 2018, and all prior papers and proceedings in this action, Julie Brown and the Miami Herald Media Company move to intervene and for an order unsealing all of the documents in the above-captioned action that have been filed under seal or redacted, and granting such other and further relief as this Court deems just and proper.

Dated: April 6, 2018  
New York, New York

Respectfully Submitted,

/s Christine N. Walz

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