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September 3, 2019

Via CM/ECF

Hon. Loretta A. Preska
District Court Judge
United States District Court
500 Pearl Street
New York, NY 10007

Re: *Giuffre v. Maxwell* | Case No.: 1:15-cv-07433-LAP

Dear Judge Preska:

Intervenor Michael Cernovich d/b/a Cernovich Media originally sought to intervene and unseal the wholly-redacted summary judgment documents filed by Defendant Ghislaine Maxwell and the subsequent summary judgment documents that would be filed relative to Maxwell's motion. See ECF Nos. 550-552. Mr. Cernovich's goal in unsealing the Maxwell records was to give the Jeffrey Epstein network the attention it deserved. Mr. Cernovich had informed many members of the press that Epstein had escaped justice, with little to no interest from them. Other than a May 4, 2017 write-up in Politico, the great travesty of the Epstein criminal case was ignored. See <https://www.politico.com/story/2017/05/04/jeffrey-epstein-trump-lawsuit-sex-trafficking-237983>. Google Trends shows that there was almost no organic interest from the public in Epstein at the time he filed his motion to intervene and unseal in January 2017.¹ See, e.g., <https://trends.google.com/trends/explore?q=Jeffrey%20Epstein&geo=US>

In the recent Second Circuit decision (ECF No. 977), Mr. Cernovich was the only party to obtain the exact relief he sought, namely the unsealing of the summary judgment records. The Miami Herald subsequently sought the full case record to be unsealed, which Mr. Cernovich believed to be far too ambitious an ask in January 2017. This belief was confirmed by the Second Circuit's ruling.

Although Mr. Cernovich ultimately joined the Miami Herald's motion to unseal the entire record (ECF No. 941) as far too much was sealed, then-including the summary judgment record, it remains unclear if his involvement in this case will remain necessary. The

¹ Google Trends tracks the number of times people search for a given keyword, and keyword searches serve as a way to determine how much public interest there is in a subject. At that time, the public was uninterested in Jeffrey Epstein and his connections to powerful people due to a lack of coverage.

remarkable, Pulitzer-level work done by Intervenor Julie Brown and her colleagues has far exceeded any expectation he had regarding the coverage the Jeffrey Epstein case would receive.

On August 9, 2019, following the issuance of the mandate, the Court scheduled a conference for September 4, 2019, to discuss how to proceed. ECF No. 979. For almost a decade, the story of Jeffrey Epstein and his confederates fell through the cracks of media coverage. For reasons that are not clear, the press seemed to be uninterested. As the Epstein story has now been reported by major every network and publication in the world, Mr. Cernovich's work as a reporter has had the desired effect of informing the public and reporting on the most powerful and evil people. Mr. Cernovich will, therefore, be notifying this Court shortly whether he believes his involvement in the case is necessary. In the interim, Mr. Cernovich does not believe it necessary for him to participate in the Conference and, as a result, undersigned counsel will not be appearing.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Mahan", with a long horizontal flourish extending to the right.

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cc: All Parties (Via CM/ECF)