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November 1, 2019

VIA ECF

The Honorable Judge 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 Virginia Giuffre hereby responds to the Court's October 30, 2019, order, Dkt. 1000, concerning Alan Dershowitz's request for pre-Answer discovery in *Giuffre v. Dershowitz*, 19 Civ. 3377. As set forth in her earlier filings, Giuffre supports the unsealing of this case's docket. *See* Dkt. 995 at 7 ("[A]ll of the documents in question are judicial documents, and accordingly the entire record should be unsealed, subject to redactions similar to what the Second Circuit applied."). Giuffre objects, however, to the selective unsealing that would occur if only one party, Dershowitz, is allowed to publish specific documents for use in counterclaims he intends to file against her. *See* Dkt. 1001 (Dershowitz requesting "unsealing of the limited material Mr. Dershowitz seeks").

To avoid the prejudice of allowing only one party to use the currently-sealed materials, Giuffre contends that the documents in question should simply be handled in the same fashion as all others. *See* Dkt. 999 at 2. If the Court grants Dershowitz's request for pre-Answer discovery, Giuffre expects that she will also be allowed to identify and publish sealed materials in response to Dershowitz's forthcoming counterclaims.

Sincerely,

/s/ Sigrid McCawley

Sigrid S. McCawley, Esq.

cc: Counsel of Record (via ECF)