

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
VIRGINIA L. GUIFFRE,	:	
	:	
Plaintiff,	:	Case No.: 15-cv-7433 (LAP)
	:	
-against-	:	
	:	
GHISLAINE MAXWELL,	:	
	:	
Defendant.	:	
	:	
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NOTICE OF MOTION TO INTERVENE AND UNSEAL

PLEASE TAKE NOTICE THAT, upon the pleadings and papers in this matter, and the accompanying Memorandum of Law, Movant-Intervenor TGP Communications, LLC, d/b/a The Gateway Pundit (“Intervenor”) respectfully moves and seeks leave to intervene in the above-captioned matter pursuant to Fed. R. Civ. P. 24(b), and requests that the Court unseal and make public and unredacted any and all documents that identify the men who abused the girls trafficked by Jeffrey Epstein and Defendant Maxwell (“the Epstein Client List”).

Sealing those documents violates the rights of the press and of the people at large, as guaranteed under the First Amendment and long-standing traditions of common law. Intervenor will move this Court for such an order before the Honorable Loretta A. Preska, United States District Judge, in the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, at 9:00 A.M. on Friday, August 19, 2022 or as soon thereafter as counsel may be heard, together with such other and further relief as this Court deems just and proper.

PLEASE TAKE NOTICE that opposition papers, if any, shall be served in accordance with Local Civil Rule 6.1.

Dated: July 28, 2022.

Respectfully Submitted,

/s/ Marc J. Randazza
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Gateway Pundit*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 28, 2022 I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I further certify that a true and correct copy of the foregoing document being served via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Jay M. Wolman

Jay M. Wolman