



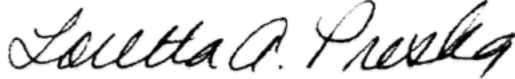
Sigrid S. McCawley
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VIA ECF

The Honorable Loretta A. Preska
District Court Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

October 26, 2023
Doe 107 shall, by November 22, 2023, submit to the Court for in camera review an affidavit supporting her assertion that she faces a risk of physical harm in her country of residence and providing detail concerning the hate mail she received. Doe 107's counsel may provide additional factual support for Doe 107's contention that unsealing the relevant records would put her at risk of physical harm by November 22, 2023 as well.

Re: *Giuffre v. Maxwell*, SO ORDERED.
Case No. 15-cv-7433-LAP


10/27/2023

Dear Judge Preska,

The Parties, the Miami Herald, and Doe 107 write in response to the Court's August 24, 2023, order. ECF No. 1306. Based on counsel's representations concerning Doe 107's safety in her current country, the Parties and the Miami Herald consent to redacting Doe 107's name and any personally identifying information in the docket entries that the Court previously ordered unsealed. Giuffre's and the Miami Herald's consent to such redactions is based on circumstances specific to Doe 107 and does not extend to other purported victims living in countries without the same risks of physical harm.

The Parties therefore respectfully request the Court's permission to maintain the redactions to Doe 107's name and personally identifying information.

Sincerely,

/s/ Sigrid S. McCawley
Sigrid S. McCawley
Counsel for Plaintiff

/s/ Richard Levitt
Richard Levitt
Counsel for Doe 107

/s/ Laura Menninger
Laura Menninger
Counsel for Defendant

/s/ Christine N. Waltz
Christine N. Waltz
Counsel for Miami Herald

cc: Counsel of Record (via ECF)

BOIES SCHILLER FLEXNER LLP