

# NBCUniversal

30 ROCKEFELLER PLAZA  
NEW YORK, NEW YORK 10112  
[cory.gnazzo@nbcuni.com](mailto:cory.gnazzo@nbcuni.com)

January 31, 2023

**BY HAND**

The Honorable Lewis A. Kaplan  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: *Carroll v. Trump*, No. 21-cv-7311 (LAK)

Dear Judge Kaplan:

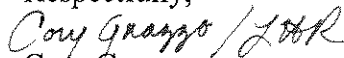
I am the Executive Producer of and write on behalf of *The Rachel Maddow Show*. On January 18, after Defendant's counsel withdrew its objections to the unsealing of "designated portions of Defendant's deposition transcript attached to Plaintiff's Opposition to Defendant's Motion for Summary Judgment," ECF No. 120, Your Honor ordered the Clerk of Court to unseal those portions of the deposition transcript "attached by ECF No. 117." ECF No. 121.

However, that order does not address the Plaintiff's opposition brief itself. That document, ECF No. 112, remains redacted with respect to any quotation from or reference to the now-unsealed excerpts of Defendant's deposition.

Because Defendant no longer objects to the unsealing of those excerpts attached to Plaintiff's opposition brief, and since his objections were the sole basis for Plaintiff's redactions to her opposition brief as filed, *see* ECF No. 11, I request that the Clerk of Court file a public, unredacted version of ECF No. 112 as soon as is practicable.

As Your Honor is aware, the public interest in this ongoing litigation and Defendant's deposition specifically is substantial, and "it is well-settled that 'documents submitted to a court for its consideration in a summary judgment motion are—as a matter of law—judicial documents to which a strong presumption of access attached, under both the common law and the First Amendment.'" *Brown v. Maxwell*, 929 F.3d 41, 47 (2d Cir. 2019).

To the extent Your Honor has questions or concerns, please do not hesitate to contact me.

Respectfully,  
  
Cory Gnazzo  
MSNBC

