

Holland & Knight

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Christine N. Walz
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January 4, 2024

Via ECF

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

Re: LETTER MOTION TO UNSEAL DOCKET ENTRY 1026-3
***Giuffre v. Maxwell*, Case No. 15-cv-7433-LAP**

Dear Judge Preska:

Intervenors Julie Brown and Miami Herald Media Company respectfully submit this letter-motion to unseal (in part) Docket Entry 1026-3 to clarify how the assigned J. Doe pseudonyms line up with the disclosed individuals in each of the unsealed docket entries, as well as the Court's reasoning associated with the same.

Docket Entry 1026-3 was submitted by counsel for Giuffre and Maxwell as part of the unsealing protocol in this matter. It lists all the non-parties listed in any of the originally sealed documents and was used by the Court to manage the unsealing process and make its determinations about what information was to be unsealed. It is, therefore, a judicial document subject to the public right of access. *See United States v. Amodeo*, 44 F.3d 141, 145 (2d Cir. 1995) (a filed document is a judicial document if it is "relevant to the performance of the judicial function and useful in the judicial process.").

Now that the Court has made all its rulings on the unsealing of documents (and as part of that decision, is releasing the names of most non-parties), this document should be unsealed in accordance with the Court's decisions.

As a practical matter, the unsealing is garnering a significant amount of media coverage – by Intervenors, other news organizations, and commentators on social media. Without this list, Intervenors and the public are puzzling together the Court's ruling with each of the unsealed documents to match the identities of each of the third parties with the Court's ruling. Many of the documents contain references to multiple Does, which makes this more challenging.

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Releasing the complete list of names and pseudonyms will avoid spread of incorrect information that may arise from trying to unweave the partial disclosures and will enable the public and press to understand this Court's reasoning.

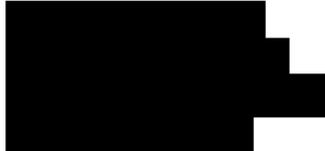
For these reasons, Intervenors respectfully request that Docket Entry 1026-3 be unsealed.

Sincerely yours,

HOLLAND & KNIGHT LLP

/s/ Christine N. Walz

Christine N. Walz

A large black rectangular redaction box covers the signature and any handwritten notes or dates that might have been present.

Attorneys for Intervenors

Julie Brown and Miami Herald Media Company