

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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UNITED STATES OF AMERICA,  
  
Plaintiff,  
v.  
GHISLAINE MAXWELL,  
  
Defendant.  
  
-----X

**20-CR-330 (AJN)**

**NOTICE OF APPEAL**

PLEASE TAKE NOTICE that Ghislaine Maxwell, Defendant in the above-captioned case, hereby appeals to the United States Court of Appeals for the Second Circuit from the district court’s September 2, 2020, Memorandum Opinion and Order denying her motion to modify the protective order. *Pichler v. UNITE*, 585 F.3d 741, 746 n.6 (3d Cir. 2009) (“We have jurisdiction under the collateral order doctrine to review the denial of the motion to modify the Protective Order and the denial of the motion to reconsider.”); *Minpeco S.A. v. Conticommodity Servs., Inc.*, 832 F.2d 739, 742 (2d Cir. 1987) (denial of motion to modify protective order is immediately appealable under the collateral order doctrine) (citing *Cohen v. Beneficial Industrial Loan Corp.*, 337 U.S. 541, 545–47 (1949)); *see also Brown v. Maxwell*, 929 F.3d 41, 44 (2d Cir. 2019) (appeal by intervenors challenging denial of motions to modify protective order and unseal).

Dated: September 3, 2020.

Respectfully submitted,

*s/ Laura A. Menninger*

Laura A. Menninger (LM-1374)

Jeffrey S. Pagliuca (*pro hac vice*)

HADDON, MORGAN AND FOREMAN, P.C.



*Attorneys for Ghislaine Maxwell*

## CERTIFICATE OF SERVICE

I certify that on September 3, 2020, I filed this *Notice of Appeal* with the Clerk of Court by mail pursuant to Section 17 of the CM/ ECF Rules and served all parties of record by email.

*/s/ Nicole Simmons*

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