

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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VIRGINIA L. GUIFFRE,	:	
	:	
Plaintiff,	:	Case No.: 15-cv-7433 (RWS)
	:	
-against-	:	
	:	
GHISLAINE MAXWELL,	:	
	:	
Defendant.	:	
	:	
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**NOTICE OF MOTION**

PLEASE TAKE NOTICE THAT, upon the pleadings and papers in the matter, the accompanying Memorandum of Law, and the Declaration of Michael Cernovich, Proposed Intervenor Michael Cernovich (“Cernovich”) d/b/a Cernovich Media (“Movant” or “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 Defendant Ghislaine Maxwell’s Memorandum of Law in Support of Defendant’s Motion for Summary Judgment (ECF No. 541), Declaration of Laura A. Menninger in Support of Defendant’s Motion for Summary Judgment (ECF No. 542) and all exhibits annexed thereto, and any and all other notices, pleadings, memoranda, declarations, exhibits, orders, and other documents filed or to be filed under seal in relation to Defendant’s Notice of Motion for Summary Judgment (ECF No. 540). Sealing these documents violates the rights of the press and of the people at large, as guaranteed to them under the First Amendment and long-standing traditions of common law. Movant will move this Court for such an order before the Honorable Robert W. Sweet, United States District Judge, in the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, at 12:00 noon on Thursday, February 16, 2017, 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: January 19, 2017.

Respectfully Submitted,

/s/ Jay M. Wolman

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Jay M. Wolman (JW0600)  
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*Attorneys for Movant/Putative Intervenor,  
Cernovich Media*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on January 19, 2017, 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.

Respectfully Submitted,

/s/ Jay M. Wolman

Jay M. Wolman