

RICHARD D. EMERY
ANDREW G. CELLI, JR.
MATTHEW D. BRINCKERHOFF
JONATHAN S. ABADY
EARL S. WARD
ILANN M. MAAZEL
HAL R. LIEBERMAN
DANIEL J. KORNSTEIN
O. ANDREW F. WILSON
ELIZABETH S. SAYLOR
DEBRA L. GREENBERGER
ZOE SALZMAN
SAM SHAPIRO
ALISON FRICK
DAVID LEBOWITZ
HAYLEY HOROWITZ
DOUGLAS E. LIEB
ALANNA KAUFMAN
JESSICA CLARKE
EMMA L. FREEMAN

EMERY CELLI BRINCKERHOFF & ABADY LLP

ATTORNEYS AT LAW
600 FIFTH AVENUE AT ROCKEFELLER CENTER
10TH FLOOR
NEW YORK, NEW YORK 10020

TELEPHONE
(212) 763-5000
FACSIMILE
(212) 763-5001
WEB ADDRESS
www.ecbalaw.com

CHARLES J. OGLETREE, JR.
DIANE L. HOUK

May 25, 2017

Via ECF and Facsimile (212) 805-7925

Hon. Robert W. Sweet
United States District Court
Southern District of New York
500 Pearl Street, Room 1940
New York, NY 10007

Re: Giuffre v. Maxwell, No. 15 Civ. 7433 (RWS)

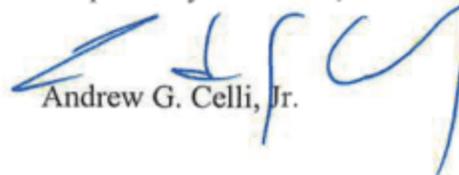
Dear Judge Sweet:

This firm represents Intervenor Alan M. Dershowitz. We write to request leave to file a letter under seal ("Letter"), pursuant to this Court's Protective Order (Dkt. No. 62).

The Letter extensively discusses and entirely concerns materials that are subject to the Protective Order. As set forth more fully in the Letter, our request is made in anticipation of the parties' forthcoming motion practice concerning the confidentiality of a deposition transcript. Intervenor takes no position on whether or not the transcript should be unsealed, but requests that—if the Court unseals the deposition—it also simultaneously unseal several related emails and attachments ("the Emails"). Unsealing the Emails will demonstrate the testimony concerning the Intervenor and others is false and that the deponent is not credible.

Intervenor therefore requests permission from the Court to file the Letter under seal and serve it upon counsel and the Court by email, pursuant to your Honor's local rules.

Respectfully submitted,


Andrew G. Celli, Jr.

c. All Counsel of Record (*via ECF*)