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October 30, 2017

Via Email

Hon. John G. Koeltl
United States District Judge
United States District Court
Daniel Patrick Moynihan Courthouse
Southern District of New York
500 Pearl Street, Room 1940
New York, New York 10007-1312

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Re: *Jane Doe 43 v. Jeffrey Epstein, et al.*, 17-cv-00616 (JGK)

Dear Judge Koeltl:

As you know, I and my law partners, Jeffrey Pagliuca and Ty Gee, of the law firm Haddon, Morgan & Foreman, P.C., represented Ms. Ghislaine Maxwell in Case No. 15-cv-7433 (RWS) (S.D.N.Y.), which was dismissed with prejudice on May 25, 2017. *Giuffre v. Maxwell*, Case No. 15-cv-7433 (RWS) (S.D.N.Y. May 25, 2017), ECF No. 919. Our firm has retained Sher Tremonte LLP with regard to this Court's Order, ECF No. 57, authorizing substitute service on "counsel for Maxwell in 15-cv-7433 (S.D.N.Y.," in the matter pending in this Court.

On today's date, Sher Tremonte has filed a letter motion seeking an opportunity on our behalf to oppose Plaintiff's motion for alternative service, or to seek reconsideration of the Court's Order granting that motion. ECF No. 68. On behalf of, but not having consulted with, Ms. Maxwell we join in that motion.

In an abundance of caution on behalf of Ms. Maxwell, and without consulting with Ms. Maxwell, we request that the Court extend the time to respond, if necessary, to the Complaint in this matter until 21 days after the Court rules on our counsel's letter motion.

APPLICATION GRANTED
SO ORDERED

John G. Koeltl, U.S.D.J.

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Respectfully submitted,

HADDON, MORGAN AND FOREMAN, P.C.

/s/ Laura A. Menninger
Laura A. Menninger

CERTIFICATE OF SERVICE

I certify that on October 30, 2017, I served the accompanying Letter Motion on the following counsel of record:

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/s/ Nicole Simmons
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