

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JANE DOE 43,

Plaintiff,

vs.

JEFFREY EPSTEIN, GHISLAINE
MAXWELL, SARAH KELLEN, LESLEY
GROFF, AND NATALYA MALYSHEV

Defendants.

CASE NO. 17 Civ 616 (JGK)

CONFIDENTIALITY STIPULATION AND [PROPOSED] ORDER

WHEREAS, the Court issued an order on November 22, 2017 granting defendants the opportunity to submit a supplemental motion to dismiss the complaint in this action (“Supplemental Motion”) (ECF # 85) (the “November 22 Order”);

NOW THEREFORE, in accordance with the November 22 Order and Federal Rule of Civil Procedure 26(c), and upon the stipulation and consent of the parties through their counsel indicated below (“Parties”), it is SO ORDERED that:

1. As consented to by Ghislaine Maxwell, the deposition of Jane Doe 43 taken in the matter captioned *Giuffre v. Maxwell*, Case No. 15-cv-07433(RWS) (“Giuffre Action”), and exhibits marked at that deposition (collectively “Jane Doe Transcript”), may be used in connection with the Supplemental Motion. Such use shall be restricted as follows:
 - a. The Jane Doe Transcript may only be used for purposes of the Supplemental Motion;
 - b. The dissemination of the Jane Doe Transcript is restricted to the parties in this action, the parties’ lawyers who are working on this matter, and the Court; and

- c. Any Jane Doe Transcript used in connection with the Supplemental Motion shall be filed under seal and not accessible to the public, and the parties will redact any of the Jane Doe Transcript from their public filings and submit under seal any portions of the Jane Doe Transcript.
2. Notwithstanding the foregoing, nothing herein shall restrict the rights of the Parties to: (a) seek discovery of materials, including the Jane Doe Transcript, from any of the Parties or non-parties in the ordinary course of discovery in this action, in the event that this action survives the motions to dismiss; and (b) use without restriction any materials, including the Jane Doe Transcript, that are obtained in such discovery. Nothing herein is intended to restrict Jane Doe 43 from using her own materials in any manner she deems appropriate, provided that should Jane Doe 43 use any materials outside of the Jane Doe Transcript, Defendants may use all of the materials produced by Jane Doe 43 in the Giuffre Action in connection with the Supplemental Motion.
3. This Stipulation and Order may be modified by the Court at any time for good cause shown following notice to all parties and an opportunity for them to be heard.

Dated: Jan 15, 2018

EDWARDS AND POTTINGER

By: 
Brad Edwards
Attorney for Plaintiff
Jane Doe 43

Dated: 1/17/18

STEPTOE & JOHNSON, LLP

By: 
Michael Miller
Attorneys for Defendants
Jeffrey Epstein and Lesley Groff

Dated: January 17, 2018

ALSTON & BIRD, LLP

By: Alexander S. Lorenzo

Alexander S Lorenzo

John E. Stephenson, Jr.

Attorneys for Defendant Sarah Kellen

SO ORDERED,

UNITED STATES DISTRICT JUDGE