



Haddon, Morgan and Foreman, P.C.
Laura A. Menninger

150 East 10th Avenue
Denver, Colorado 80203
PH 303.831.7364 FX 303.832.2628
www.hmflaw.com
lmenninger@hmflaw.com

May 21, 2018

Via ECF

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

Re: *Sarah Ransome v. Jeffrey Epstein, et al.*, 17-cv-00616 (JGK)

Dear Judge Koeltl:

This letter motion seeks the Court's permission to file an un-redacted copy of Defendant Ghislaine Maxwell's Reply in Support of Motion to Dismiss, and Exhibit C to the Declaration of Laura A. Menninger in Support of the Reply in Support of Motion to Dismiss, under seal pursuant to paragraph 1(c) of the Court's Confidentiality Stipulation and Order (Doc. #100) dated January 19, 2018.

Ms. Maxwell has redacted any references to Ms. Ransome's deposition exhibits as provided in the Court's Confidentiality Stipulation and Order (Doc. #100). Accordingly, Ms. Maxwell respectfully requests that she may file her unredacted brief and exhibit under seal.

Respectfully submitted,

HADDON, MORGAN AND FOREMAN, P.C.

/s/ Laura A. Menninger

Laura A. Menninger

Hon. John G. Koeltl
May 21, 2018
Page 2

CERTIFICATE OF SERVICE

I certify that on May 21, 2018, I served the accompanying Letter Motion on the following counsel of record:

Sigrid S. McCawley
Meredith Schultz
Boies, Schiller & Flexner, LLP
401 East Las Olas Boulevard, Ste. 1200
Ft. Lauderdale, FL 33301
smccawley@bsflp.com
mschultz@bsflp.com

Bradley J. Edwards
EDWARDS POTTINGER LLC
425 North Andrews Ave., Ste. 2
Ft. Lauderdale, FL 33301
brad@pathtojustice.com

John E. Stephenson, Jr.
Jonathan D. Parente
Alexander S. Lorenzo
ALSTON & BIRD, LLP
90 Park Avenue
New York, NY 10016
john.stephenson@alston.com
jonathan.parente@alston.com
alexander.lorenzo@alston.com

Paul G. Cassell
383 S. University Street
Salt Lake City, UT 84112
cassellp@law.utah.edu

Michael C. Miller
Justin Y.K. Chu
Michael A. Keough
STEPTOE & JOHNSON, LLP
1114 Avenue of the Americas
New York, NY 10036
mmiller@steptoe.com
jchu@steptoe.com
mkeough@steptoe.com

/s/ Nicole Simmons

Nicole Simmons