



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

July 24, 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:

Yesterday, this Court scheduled an oral argument for this Friday, July 27, 2018 at 2:30 p.m. On behalf of defendant Ghislaine Maxwell, this letter requests an adjournment of that Oral Argument. After consultation with the other parties and subject to this Court's approval, Ms. Maxwell requests an adjournment to September 24-26, or August 21-24. Counsel for plaintiff and for defendant Jeffrey Epstein and Lesley Groff do not oppose the adjournment. Counsel for Ms. Kellen has not responded with a position.

The grounds for seeking this adjournment are as follows. Counsel for Ms. Maxwell is unavailable this Friday due to pre-existing family travel plans; co-counsel for Ms. Maxwell likewise is out of town this week. Second, counsel for three of the parties will travel from out of state for purposes of the oral argument and a setting further out will allow for more efficient travel arrangements.

Under these circumstances, and for reasons of efficiency, we request an adjournment of the Oral Argument to September 24-26, or August 21-24.

Hon. John G. Koeltl
July 24, 2018
Page 2

Respectfully submitted,

HADDON, MORGAN AND FOREMAN, P.C.

/s/ Laura A. Menninger

Laura A. Menninger

CERTIFICATE OF SERVICE

I certify that on July 24, 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@bsfllp.com
mschultz@bsfllp.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
Alexander Seton Lorenzo
John E. Stephenson Jr.
Alston & Bird, LLP
90 Park Avenue
New York, NY 10016
alexander.lorenzo@alston.com
john.stephenson@alston.com

/s/ Nicole Simmons

Nicole Simmons