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November 6, 2018

Via ECF

The Hon. Magistrate Sarah Netburn
Thurgood Marshall Courthouse
Southern District of New York
40 Foley Square, Room 430
New York, New York 10007

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

Dear Judge Netburn:

I write to ask the Court to enter the attached proposed Protective Order in advance of my client, Ms. Ghislaine Maxwell's, deposition in this matter on Thursday, November 8, 2018.

As this Court is aware, the parties ultimately agreed Ms. Maxwell's deposition would occur in New York on November 8, 2018. At the time the parties reached that agreement on October 12, 2018, counsel for Plaintiff and for the other Defendants all orally indicated their agreement to use the protective order that was agreed to by the same counsel in *Giuffre v. Maxwell*, 15-cv-7433-RWS, Doc. #62, and signed by Judge Robert Sweet.

Last Tuesday, in advance of producing documents responsive to Plaintiff's Request for Production of Documents, I circulated that same protective order and asked whether I could submit it as a proposed joint protective order. On Thursday afternoon and on Sunday, counsel for Plaintiff submitted proposed changes to the protective order. Undersigned counsel agreed to one of the changes and countered the other proposed change. Today, counsel for Mr. Epstein proposed other changes. In sum, the parties have been unable to agree on the changes as of today's date.

Due to the sensitive nature of the topics at issue in this case, it is imperative that a protective order be in place prior to Ms. Maxwell's production of documents and prior to her deposition on Thursday. *See, e.g., id.* at Doc. # 953 (Opinion and Order of Hon. Robert W. Sweet) (discussing reliance by parties and witnesses on the protective order concerning topics of a highly sensitive nature). While counsel may all ultimately agree to modifications to the attached protective order, Ms. Maxwell wants to ensure that the deposition proceed as scheduled. Travel for counsel and the parties are required for the New York deposition. Therefore, Ms. Maxwell requests that, in the interim, this Court adopt the same protective order so that the documents may be produced and the deposition may proceed, both of which may include designation of Confidential Information.

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Counsel for Ms. Maxwell respectfully requests a telephone conference with the Court for purposes of resolving the matter without the need for the filing of a motion.

Respectfully submitted,

HADDON, MORGAN AND FOREMAN, P.C.

/s/ Laura A. Menninger

Laura A. Menninger

Attachment: Proposed Protective Order