

Jeffrey S. Pagliuca (*pro hac vice*)
HADDON, MORGAN AND FOREMAN, P.C.
150 East 10th Avenue
Denver, CO 80203
Phone: 303.831.7364
Fax: 303.832.2628
jpagliuca@hmflaw.com

Denise D. Riley (# 160245)
Riley Law PLLC
2710 Del Prado Blvd. S., Unit 2-246,
Cape Coral, FL 33904
Phone: 303.907.0075
denise@rileylawpl.com

Attorneys for Ghislaine Maxwell

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

In re: SUBPOENA TO BRADLEY J.
EDWARDS

Underlying case:

VIRGINIA L. GIUFFRE, Plaintiff

v.

GHISLAINE MAXWELL, Defendant

No. 15-cv-07433-RWS (S.D.N.Y.)

**MOTION TO FILE CERTAIN EXHIBITS
UNDER SEAL**

Case Number 0:16-mc-61262-JEM

Defendant Ghislaine Maxwell pursuant to Rule 5.4 (b) of the Local Rules of the U.S. District Court for the Southern District of Florida, requests permission to file exhibits A, G, H, I, and N, attached to the Declaration of Jeffrey S. Pagliuca In Support of Defendant Ghislaine Maxwell's Response In Opposition of Motion of Bradley J. Edwards Motion to Quash Subpoena or, in the Alternative, for a Protective Order, under seal for the following reason:

1. Exhibits A, G, H, I, and N have been designated CONFIDENTIAL pursuant to a protective order issued by the U.S. District Court in the Southern District of New York in the underlying matter, *Giuffre v. Maxwell*, 15-cv-07433-RWS.
2. Under the terms of the protective order documents designated confidential may not be shared publicly.
3. Ms. Maxwell requests that the exhibits be permanently sealed.

Dated June 29, 2016

Respectfully submitted,

/s/ Jeffrey S. Pagliuca

Jeffrey S. Pagliuca (*pro hac vice*)
HADDON, MORGAN AND FOREMAN, P.C.
150 East 10th Avenue
Denver, CO 80203
Phone: 303.831.7364
Fax: 303.832.2628
jpagliuca@hmflaw.com

Denise D. Riley (# 160245)
Riley Law PLLC
2710 Del Prado Blvd. S., Unit 2-246,
Cape Coral, FL 33904
Phone: 303.907.0075
denise@rileylawpl.com

Attorneys for Ghislaine Maxwell

CERTIFICATE OF SERVICE

I hereby certify that on June 29, 2016, I electronically filed the foregoing *Motion to File Certain Exhibits Under Seal* with the Clerk of Court using the CM/ECF system which sent notification of such filing to the following:

Jack Scarola
Searcy Denney Scarola Barnhart &
Shipley, P.A.
2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 34409
Phone: 561-686-6300
Fax : 561-383-9451
jsx@searcylaw.com
mep@searcylaw.com
Attorneys for Plaintiff Bradley J.
Edwards

/s/ *Nicole Simmons*
