

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 003	235-13, 249-13, 280-1, 321-1, 423-4	Employee of Epstein; Alleged Witness	<p>Plaintiff: This material should be unsealed in full. First, “[t]he burden of demonstrating that a document submitted to a court should be sealed rests on the party seeking such action.” <i>DiRussa v. Dean Witter Reynolds Inc.</i>, 121 F.3d 818, 826 (2d Cir. 1997). This individual did not raise any objection to unsealing, and thus did not meet their burden of identifying “with specificity competing and compelling interests in closure” and that “those interests outweigh the presumption of access.” <i>Lytte v. JPMorgan Chase</i>, 810 F. Supp. 2d 616, 621 (S.D.N.Y. 2011). Second, this individual gave a media interview about their work for Epstein to the Daily Mail in 2011, weighing against continued sealing. <i>United States v. Avenatti</i>, No. (S1) 19 CR. 373 (PGG), 2020 WL 70952, at *6 (S.D.N.Y. Jan. 6, 2020) (“In considering whether sealing is appropriate, an important consideration is, of course, whether the information sought to be kept confidential is already public.”); 4/19/22 Hearing Tr. at 7:11-16 (unsealing documents relating to Doe who gave media interviews and was identified in the press); <i>see</i> [REDACTED]</p> <p>Defendant: All docket mentions are Rule 26 disclosures. This individual and Doe #4 reportedly live abroad and no confirmation of receipt of the Notice was received.</p>
J. DOE 004	235-13, 249-13, 280-1, 321-1, 423-4	Employee of Epstein; Alleged Witness	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytte</i>, 810 F. Supp. 2d at 621. Second, this individual gave a media interview about their work for Epstein to the Daily Mail in 2011, weighing against continued sealing. <i>Avenatti</i>, 2020 WL 70952, at *6; 4/19/22 Hearing Tr. at 7:11-16; <i>see</i> [REDACTED]</p>

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 007	338, 338-1, 338-9, 369-12, 397, 398, 398-5, 468, 469, 469-2, 479, 514-5, 660-1	Employee of Epstein	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytile</i>, 810 F. Supp. 2d at 621. Second, portions of this individual's deposition were released by the Second Circuit, meaning their name and association with this case is already public. <i>Avenatti</i>, 2020 WL 70952, at *6; 7/1/21 Hearing Tr. at 6-7 (ruling that materials released by the Second Circuit should be unsealed). This individual's name and relationship to Epstein were also publicly discussed at Maxwell's criminal trial.</p> <p>Defendant: Confirmation of receipt of Notice received.</p>
J. DOE 008	144-6, 173-6, 249-13, 369-1, 407-9, 423-4	Alleged Epstein Affiliate	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytile</i>, 810 F. Supp. 2d at 621. Second, this individual gave a media interview about their interactions with Epstein to Vanity Fair in 2020, weighing against continued sealing. <i>Avenatti</i>, 2020 WL 70952, at *6; 4/19/22 Hearing Tr. at 7:11-16 (unsealing documents relating to Doe who gave media interviews and was identified in the press); <i>see</i> [REDACTED]</p> <p>Defendant: No confirmation of receipt of Notice received.</p>

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 009	122-4, 173-6, 180-1, 180-3, 235-13, 280-1, 321-1, 321-2, 321-3, 321-4, 338, 338-3, 346-4, 369-1, 384-1, 388, 389-8, 392, 397, 398-1, 466, 467-1, 467-2, 481, 482, 482-1, 482-3, 482-4, 637, 638, 638-1, 638-2, 638-3, 638-4, 638-5, 653, 654, 654-1, 660-3, 697, 698, 698-1, 698-2, 754	Alleged Witness; Alleged Maxwell Employee	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lyle</i>, 810 F. Supp. 2d at 621. Second, documents relating to this individual, including emails on which the individual is copied and a substantive declaration by the individual, were released by the Second Circuit, meaning their name and association with this case is already public. <i>Avenatti</i>, 2020 WL 70952, at *6; 7/1/21 Hearing Tr. at 6-7 (ruling that materials released by the Second Circuit should be unsealed).</p> <p>Defendant: Confirmation of receipt of Notice received.</p>
J. DOE 010	173-6, 180-3, 346-4, 369-1, 384-1, 482-2, 638-1, 698-1, 698-2	Alleged Witness; Alleged Maxwell Employee	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lyle</i>, 810 F. Supp. 2d at 621. Further, this individual actually requested excerpts of materials mentioning them, which the parties sent them, and still raised no objection to unsealing after receiving those excerpts. Second, the sealed material as to this individual is not salacious.</p> <p>Defendant: Individual served via email. No confirmation of receipt of Notice received.</p>

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 011	173-6, 249-13, 280-1, 321-1, 340-3, 340-4, 363-7, 369-1, 423-4	Alleged Epstein Affiliate	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytte</i>, 810 F. Supp. 2d at 621. Second, this individual's association with Epstein has been reported in the media already, and their name came up at Maxwell's public criminal trial. <i>Avenatti</i>, 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25.</p> <p>Defendant: No confirmation of receipt of Notice received.</p>
J. DOE 013	249-13, 321-1, 321-5, 321-6, 363-7, 423-4	Alleged Employee of Epstein; Alleged Witness; Alleged Perpetrator	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytte</i>, 810 F. Supp. 2d at 621. Second, this individual's association with Epstein has been reported in the media already, and their name came up at Maxwell's public criminal trial. <i>Avenatti</i>, 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25.</p> <p>Defendant: Confirmation of receipt of Notice received.</p>
J. DOE 014	340-4	Alleged Epstein Affiliate	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytte</i>, 810 F. Supp. 2d at 621. Second, the sealed material as to this individual is not salacious.</p> <p>Defendant: sole reference is a deposition question to which the deponent denied any knowledge of individual. No confirmation of receipt of Notice was received.</p>

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 015	249-13, 280-1, 321-1, 363-7, 423-4	Alleged Victim Affiliate	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytte</i>, 810 F. Supp. 2d at 621. Second, the sealed material as to this individual is not salacious and consists primarily of Rule 26 disclosures.</p> <p>Defendant: This individual gave a press interview in 2011 publicly denying that Epstein had been alone with Doe # 16, who she mentioned by name and whose photograph is contained in the article. The article was produced by Plaintiff in this action at Giuffre003394 and was broadcast over the Web to millions of users. [REDACTED] (the article appears to have been removed from the internet but a copy of Plaintiff's produced version can be provided to the Court upon request).</p> <p>All redacted references are R. 26 disclosures, search terms, and a deponent who denied ever meeting individual. Confirmation of receipt of Notice was received.</p>
J. DOE 016	150-1, 172, 173-6, 229-2, 249-13, 321-1, 321-5, 321-6, 339, 340-3, 340-4, 363-7, 369-1, 400, 401-5, 423-4, 450-1	Alleged Victim	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytte</i>, 810 F. Supp. 2d at 621. Second, this individual testified publicly at Maxwell's criminal trial, weighing against continued sealing. <i>Avenatti</i>, 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25 (unsealing documents relating to Doe whose name came up publicly at Maxwell criminal trial). This individual, however, testified under a pseudonym with Judge Nathan's permission. Plaintiff therefore has no objection to the redaction of only this individual's name in documents that are not already public, but any relevant information about their allegations against Epstein and Maxwell should be unsealed because this individual revealed that information at trial publicly.</p>

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
			<p>Defendant: As an adult, this Doe voluntarily interviewed with the press about her allegations against Epstein. [REDACTED]</p> <p>The Second Circuit has already released this Doe's entire name and details about her profession. Ex. KK to the summary judgment motion at pages 28 and 29.</p> <p>Ms. Maxwell objected to this witness testifying under a pseudonym at the criminal trial. See 20-cr-330, Dkt. 382 at pp. 4-23 (redacted). And for the same reasons objects to further "redaction of only this individual's name" as Plaintiff urges.</p>
J. DOE 018	381-3	Law Enforcement Officer	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytte</i>, 810 F. Supp. 2d at 621. Second, this individual's name appears only in an already publicly available police report, and the individual appears to be a member of law enforcement (specifically, an assistant state attorney). Finally, the only document that substantively discusses this individual is already publicly available on the docket with this individual's name unredacted. See D.E. 1199-10.</p> <p>Defendant: No confirmation of receipt of Notice was received.</p>
J. DOE 019	180-2, 203, 211, 235-10, 235-13, 249-14, 280-1, 321-1, 363-7	Alleged Victim Affiliate	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytte</i>, 810 F. Supp. 2d at 621. Second, this individual's role in this case has been reported in the media already. <i>Avenatti</i>, 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25.</p> <p>Defendant: Confirmation of receipt of Notice was received.</p>

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 020	656-2, 947-1	Alleged Witness Affiliate	<p>Plaintiff: Docket Entry 656-2 is a publicly available news article, and should thus be unsealed in full. Plaintiff takes no position on Docket Entry 947-1.</p> <p>Defendant: Doe was served through affiliated company, no confirmation of receipt was received.</p>
J. DOE 021	435	Alleged Epstein Affiliate	<p>Plaintiff: This material should be unsealed in full. This individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytte</i>, 810 F. Supp. 2d at 621.</p> <p>Defendant: This individual is a public figure and the only insinuation is that his name was contained, along with many others, in an Epstein address book. There is no salacious allegation about him contained in the sole document. Confirmation of receipt was received.</p>
J. DOE 022	701-1, 947-1	Alleged Epstein Affiliate	<p>Plaintiff: This material should be unsealed in full. This individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytte</i>, 810 F. Supp. 2d at 621. Second, this individual's association with Epstein has been reported in the media already. <i>Avenatti</i>, 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25.</p> <p>Defendant: This individual is a public figure and none of the materials that relate to him are salacious.</p>

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 025	235-13, 381-3	Alleged Victim Affiliate; Alleged Perpetrator	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytte</i>, 810 F. Supp. 2d at 621. Second, the only document that substantively discussing this individual is already publicly available on the docket with this individual's name unredacted. <i>See</i> D.E. 1199-10.</p> <p>Defendant: Confirmation of receipt of Notice was received.</p>
J. DOE 026	381-3	Alleged Victim Affiliate	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytte</i>, 810 F. Supp. 2d at 621. Second, the only document that substantively discussing this individual is already publicly available on the docket with this individual's name unredacted. <i>See</i> D.E. 1199-10.</p> <p>Defendant: No confirmation of receipt of Notice received.</p>
J. DOE 027	249-13, 280-1, 321-1, 369-10, 423-4	Alleged Epstein Affiliate	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytte</i>, 810 F. Supp. 2d at 621. Second, the sealed material as to this individual is not salacious and consists primarily of Rule 26 disclosures. Third, this individual's association with Epstein has been reported in the media already. <i>Avenatti</i>, 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25.</p> <p>Defendant: No confirmation of receipt of Notice was received.</p>

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 029	363-7	Employee of Epstein	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytte</i>, 810 F. Supp. 2d at 621. Second, the sealed material as to this individual is not salacious.</p> <p>Defendant: The parties were unable to locate an address for this individual and therefore no notice was provided. Dkt. 1116, ¶ 7. Only reference is deposition answer that he was a staff member possibly present at a time and place.</p>
J. DOE 030	340-4	Alleged Epstein Affiliate	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytte</i>, 810 F. Supp. 2d at 621. Second, the sealed material as to this individual is not salacious.</p> <p>Defendant: Confirmation of receipt of Notice received. Only reference is a deposition question to which the deponent stated did not know the Doe.</p>
J. DOE 031	235-4, 405-1	Unknown ¹	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytte</i>, 810 F. Supp. 2d at 621. Second, the sealed material as to this individual is not salacious.</p> <p>Defendant: The parties were unable to locate an address for this individual and therefore no notice was provided. Dkt. 1116, ¶ 7. Only references to individual are passing and in benign context.</p>

¹ For individuals characterized as “unknown,” the parties have been unable to determine from the information available to them and the relevant docket entries how to accurately characterize the individual.

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 032	173-5, 185-11, 235-4, 363-7, 369-10, 656-2	Alleged Epstein Affiliate	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytile</i>, 810 F. Supp. 2d at 621. Second, this individual's association with Epstein has been widely reported in the media already, and the Second Circuit unsealed this individual's name and information about their relationship with Epstein. <i>Avenatti</i>, 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25.</p> <p>Defendant: Plaintiff denied ever meeting this individual so not a witness. No confirmation of receipt of Notice received.</p>
J. DOE 033	173-6, 235-13, 249-13, 280-1, 321-1, 321-5, 321-6, 340-3, 340-4, 369-1, 423-4	Alleged Epstein Affiliate	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytile</i>, 810 F. Supp. 2d at 621. Second, the sealed material as to this individual is not salacious and consists primarily of Rule 26 disclosures.</p> <p>Defendant: The parties were unable to locate an address for this individual and therefore no notice was provided. Dkt. 1116, ¶ 7. All references are either R. 26 disclosure or search term.</p>
J. DOE 034	701-1	Plaintiff: Alleged Victim Affiliate Defendant: Alleged Witness Affiliate	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytile</i>, 810 F. Supp. 2d at 621. Second, the sealed material as to this individual is not salacious.</p> <p>Defendant: No confirmation receipt of Notice received. The Doe was an affiliate of a purported 404(b) adult witness who was not named a victim either by this Court nor the criminal court.</p>

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 035	231, 249-13, 280-1, 321-1, 321-5, 321-6, 340-4, 355-2, 423-4	Alleged Epstein Affiliate	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytile</i>, 810 F. Supp. 2d at 621. Second, the sealed material as to this individual is not salacious and mostly relate to deposition scheduling.</p> <p>Defendant: No confirmation of receipt of Notice received.</p>
J. DOE 036	144-6, 173-5, 173-6, 180-1, 180-6, 203, 211, 224, 228, 229-4, 235-4, 235-13, 246, 247- 1, 272-5, 272-6, 280-1, 307-8, 320, 321-1, 321-2, 321-3, 321-4, 321-6, 339, 340-1, 340-3, 354, 355-2, 363, 363-1, 363-7, 364, 368, 369-1, 369-2, 369-10, 378, 388, 389-9, 407-6, 407-8, 407-9, 423-1, 423-4, 435, 450-1, 471-1, 510-4, 632-1,	Alleged Epstein Affiliate	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytile</i>, 810 F. Supp. 2d at 621. Further, this individual actually requested excerpts of materials mentioning them, which the parties sent them, and still raised no objection to unsealing after receiving those excerpts. Second, this individual's association with Epstein and Maxwell has been widely reported in the media already, and their name came up at Maxwell's public criminal trial. <i>Avenatti</i>, 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25.</p> <p>Defendant: The criminal trial testimony concerning the individual was limited to a single reference to a plane flight. The items that Plaintiff hopes to unseal contain a number of salacious, unproven allegations about this individual. Judge Sweet denied Plaintiff's efforts to depose the individual finding the "relevance of testimony" of the individual has "not been adequately established." <i>See</i> Order of June 20, 2016 at 17. The individual was served with the Notice through counsel.</p>

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
	656-2, 657, 947-1		
J. DOE 037	173-6, 180-1, 180-6, 185-3, 249-13, 272-5, 369-1, 388, 389-9, 407-18, 423-4	Alleged Maxwell Affiliate	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytle</i>, 810 F. Supp. 2d at 621. Further, this individual actually requested excerpts of materials mentioning them, which the parties sent them, and still raised no objection to unsealing after receiving those excerpts. Second, the sealed materials all relate to the same two facts about this individual's association with Maxwell, which is not salacious and has been widely reported in the media already. <i>Avenatti</i>, 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25.</p> <p>Defendant: The individual was served with the Notice through counsel.</p>
J. DOE 038	272-5, 320, 407-21, 947-1	Alleged Epstein Affiliate	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytle</i>, 810 F. Supp. 2d at 621. Further, this individual actually requested excerpts of materials mentioning them, which the parties sent them, and still raised no objection to unsealing after receiving those excerpts. Finally, the sealed material about this individual is not salacious.</p> <p>Defendant: Served through counsel.</p>
J. DOE 039	423-1, 510-4, 656-2	Media	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytle</i>, 810 F. Supp. 2d at 621. Second, this individual is a journalist who investigated Epstein, and thus their materials should all be unsealed.</p>

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 040	172, 173-5, 407-6, 407-8, 407-9, 450-1	Alleged Epstein Affiliate	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytile</i>, 810 F. Supp. 2d at 621. Second, this individual's association with Epstein has been reported in the media already, and in fact certain of the sealed documents at issue are news articles. <i>Avenatti</i>, 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25.</p> <p>Defendant: The parties were unable to locate an address for this individual and therefore no notice was provided. Dkt. 1116, ¶ 7.</p>
J. DOE 041	249-13, 321-1, 321-5, 321-6, 423-4	Alleged Victim	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytile</i>, 810 F. Supp. 2d at 621. Second, the sealed material as to this individual is not salacious and consists primarily of Rule 26 disclosures and lists of search terms.</p> <p>Defendant: All references are either R. 26 disclosures or search terms.</p>
J. DOE 042	249-13, 280-1, 321-1, 321-5, 321-6, 363-7, 423-4	Alleged Epstein Affiliate	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytile</i>, 810 F. Supp. 2d at 621. Second, the sealed material as to this individual is not salacious and consists primarily of Rule 26 disclosures.</p> <p>Defendant: Served. All references either R. 26 disclosure, search term, or one deponent denying knowledge of the individual.</p>
J. DOE 043	700, 701-1	Plaintiff: Alleged Victim	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytile</i>, 810 F. Supp. 2d at 621.</p>

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
		Defendant: Alleged Epstein Affiliate	Defendant: No confirmation receipt of Notice received. The Doe was an affiliate of a purported 404(b) adult witness who was not named a victim either by this Court nor the criminal court, nor did she allege herself to be a victim in this case.
J. DOE 044	249-13, 280-1, 321-1, 321-5, 321-6, 363-7, 369-10, 423-4	Plaintiff: Alleged Victim Defendant: Alleged Epstein Affiliate	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytle</i> , 810 F. Supp. 2d at 621. Second, this individual's allegations against Epstein and others has been previously reported on by the press, and this individual has given multiple interviews to the media. <i>Avenatti</i> , 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25; <i>see</i> [REDACTED] Defendant: 369-10 is a news article on the internet. Most of the documents are R. 26 disclosure or search terms.
J. DOE 045	247-1, 249-13, 280-1, 321-1, 321-5, 423-4	Plaintiff: Alleged Victim Defendant: Alleged Epstein Affiliate	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytle</i> , 810 F. Supp. 2d at 621. Further, this individual actually requested excerpts of materials mentioning them, which the parties sent them, and still raised no objection to unsealing after receiving those excerpts. Second, this individual's allegations against Epstein and others has been previously reported on by the press, and this individual has given multiple interviews to the media. <i>Avenatti</i> , 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25; <i>see</i> [REDACTED] Defendant: Served through counsel. All items (except 247-1) either R. 26 disclosure or search term.

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 046	258-3	Alleged Victim Affiliate	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytle</i>, 810 F. Supp. 2d at 621. Second, the sealed material as to this individual is not salacious.</p> <p>Defendant: The parties were unable to locate an address for this individual and therefore no notice was provided. Dkt. 1116, ¶ 7.</p>
J. DOE 047	232-9, 235-8	Law Enforcement	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytle</i>, 810 F. Supp. 2d at 621. Second, this individual's name appears only in an already publicly available police report released by the Second Circuit, and the individual appears to be a member of law enforcement (specifically, a detective). Finally, the only document that substantively discussing this individual is already publicly available on the docket with this individual's name unredacted. <i>See</i> D.E. 1199-10.</p> <p>Defendant: No confirmation receipt of Notice received.</p>
J. DOE 048	249-13, 280-1, 321-1, 321-5, 321-6, 339, 423-4	Plaintiff: Alleged Victim Defendant: Alleged Witness	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytle</i>, 810 F. Supp. 2d at 621. Second, this individual's allegations against Epstein and others have been previously reported on by the press, and this individual testified publicly at a hearing before Judge Berman after Epstein's death. <i>Avenatti</i>, 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25.</p> <p>Defendant: This individual testified under a pseudonym at the criminal trial. Judge Nathan determined that this witness was not a victim as a matter of law</p>

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
			in the criminal trial. Judge Berman permitted any number of individuals to speak who were not named or otherwise adjudicated victims.
J. DOE 049	passim	Plaintiff: Alleged Perpetrator, Alleged Epstein Affiliate Defendant: Alleged Epstein Affiliate	Plaintiff: This material should be unsealed in full. This individual has advocated to this Court that all materials relating to them should be unsealed. <i>See, e.g.</i> , D.E. 1138. Further, Defendant mischaracterizes Plaintiff's statements regarding her settlement with Doe 49, and Plaintiff refers the Court to her public statements on this topic. Defendant: Plaintiff has publicly stated that she was "mistaken" with regard to her allegations against this individual and thus, there is no basis to advocate that he is an alleged "perpetrator." Specifically, Plaintiff publicly stated the following: [REDACTED] [REDACTED] [REDACTED] [REDACTED]
J. DOE 050		Alleged Victim Affiliate	Plaintiff: This individual is a medical provider whose name has already been revealed in documents on the docket, unredacted. <i>See</i> D.E. 1256-19. Defendant: Served. No unsealed documents related to this individual
J. DOE 051	249-13, 280-1, 321-1, 321-5, 321-6, 423-4	Employee of Epstein	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytte</i> , 810 F. Supp. 2d at 621. Second, the sealed material as to this individual is not salacious and consists primarily of Rule 26 disclosures and lists of search terms.

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
			Defendant: The parties were unable to locate an address for this individual and therefore no notice was provided. Dkt. 1116, ¶ 7. All references are either R. 26 disclosures or search terms.
J. DOE 052	150-1, 173-6, 340-3, 369-1	Plaintiff: Alleged Victim; Alleged Witness Defendant: Alleged Witness	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytte</i> , 810 F. Supp. 2d at 621. Second, the sealed material as to this individual is not salacious. Defendant: No confirmation of receipt of the Notice was received. Defendant knows of no basis for considering this individual a “victim”.
J. DOE 057	235-13, 249-13, 280-1, 321-1, 321-5, 321-6, 338, 338-6, 423-4	Plaintiff: Alleged Victim Defendant: Alleged Victim Affiliate	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytte</i> , 810 F. Supp. 2d at 621. Defendant: No confirmation of receipt of the Notice was received. Defendant knows of no basis for considering this individual a “victim”.
J. DOE 058	947-1	Alleged Witness Affiliate; Alleged Perpetrator	Plaintiff: Plaintiff takes no position on Docket Entry 947-1. Defendant: This individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytte</i> , 810 F. Supp. 2d at 621.

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 059	235-10, 380, 423-1, 510-4	Alleged Perpetrator	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytile</i>, 810 F. Supp. 2d at 621. Second, this individual is alleged to have engaged in serious wrongdoing, and it is generally the privacy interests of “innocent third parties” that “weigh heavily in a court’s balancing equation.” <i>Amodeo</i>, 71 F.3d at 1050. Third, this individual or their representatives will have “a fair opportunity” to respond to any unsealed accusations, putting countervailing privacy interests “at the lowest.” <i>Huntley</i>, 943 F. Supp. 2d at 387. Finally, this individual’s name was unsealed in materials released by the Second Circuit.</p> <p>Defendant: This individual is dead and therefore will not have “a fair opportunity” to respond to any unsealed accusations which apparently was never adjudicated publicly. Dkt. 1116 at ¶ 8.</p>
J. DOE 061	249-13, 280-1, 321-1, 321-5, 321-6, 423-4	Unknown	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytile</i>, 810 F. Supp. 2d at 621. Second, the sealed material as to this individual is not salacious and consists primarily of Rule 26 disclosures.</p> <p>Defendant: The parties were unable to locate an address for this individual and therefore no notice was provided. Dkt. 1116, ¶ 7. All of the references are either in R. 26 disclosures or search terms.</p>
J. DOE 062	258-3	Alleged Victim	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytile</i>, 810 F. Supp. 2d at 621. Second, the sealed material as to this individual is not salacious.</p>

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
			<p>Defendant: The parties were unable to locate an address for this individual and therefore no notice was provided. Dkt. 1116, ¶ 7. This individual's name is mentioned once in a deposition as to a victim whose name the Second Circuit kept sealed. (<i>See Doe # 84</i>). Releasing the individual's name could harm the privacy interests of the individual the Court deemed sealable by allowing the press and others to identify the deponent's identity. The only reference is a deposition question to which the answer was not included in the excerpt.</p>
J. DOE 063	144-4, 144-6, 150-1, 173-6, 235-13, 249-13, 315, 339, 340-3, 340-4, 368, 369-1, 423-4, 845, 856	Alleged Victim	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lyle</i>, 810 F. Supp. 2d at 621. Second, this individual's allegations against Epstein and others has been previously reported on by the press, this individual has given multiple interviews to the media, and this individual testified publicly at Maxwell's criminal trial under their real name. <i>Avenatti</i>, 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25; [REDACTED]</p> <p>Defendant: Plaintiff's counsel represents this individual and so should be in a position to give her position on unsealing directly.</p>
J. DOE 064	280-1, 315, 316-7, 321-1, 339, 340-4, 368, 369-3, 845, 856	<p>Plaintiff: Alleged Victim</p> <p>Defendant: Alleged Witness</p>	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lyle</i>, 810 F. Supp. 2d at 621. Second, this individual's allegations against Epstein and others has been previously reported on by the press, and this individual has given multiple interviews to the media. <i>Avenatti</i>, 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25; [REDACTED]</p> <p>Defendant: Plaintiff's counsel represents this individual and so should be in a position to give her position on unsealing directly.</p>

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 065	172, 173-5, 235-13 ██████████ 249-13, 280-1, 321-1, 321-5, 321-6, 407-6, 423-4, 493-1	Alleged Epstein Affiliate; Alleged Witness	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytle</i>, 810 F. Supp. 2d at 621. Second, this individual's association with Epstein has been widely reported in the media already, and the Second Circuit unsealed this individual's name and information about their relationship with Epstein. <i>Avenatti</i>, 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25.</p> <p>Defendant: Served</p>
J. DOE 066	235-4, 235-13, 280-1, 316-7, 321-1, 340-4, 369-3, 381-1	Alleged Victim Affiliate; Alleged Witness	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytle</i>, 810 F. Supp. 2d at 621.</p>
J. DOE 067	203, 211, 235-4, 235-13, 249-13, 249-14, 257, 258, 258-3, 258-4, 258-9, 261, 267, 268, 268-2, 280-1, 307-8, 315, 316, 316-2, 316-7, 321-1, 321-5, 321-6, 339, 340, 340-4, 340-8, 363-7, 368, 369, 369-3, 369-4, 381-3, 388, 389, 389-4,	<p>Plaintiff: Alleged Victim Affiliate; Alleged Witness</p> <p>Defendant: Alleged Victim Affiliate; Alleged Perpetrator; Alleged Witness</p>	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytle</i>, 810 F. Supp. 2d at 621. Second, portions of this individual's deposition were released by the Second Circuit, meaning their name and association with this case is already public. <i>Avenatti</i>, 2020 WL 70952, at *6; 7/1/21 Hearing Tr. at 6-7.</p> <p>Defendant: During the criminal trial, one of the named victims testified that Plaintiff and this individual, who were then both over the age of 18, recruited her at the age of 14 to provide massages to Epstein. This Doe's first and last name were provided in open court in connection with these allegations. <i>See</i> Trial Tr. 1517, 1743 (<i>U.S. v. Maxwell</i>, 20-cr-330).</p>

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
	392, 393, 393-1, 400, 401, 401-6, 423-1, 423-4, 450-1, 510-4, 513, 845, 856		
J. DOE 068	340-4	Plaintiff: Alleged Victim Affiliate Defendant: Alleged Witness Affiliate	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytile</i> , 810 F. Supp. 2d at 621. Second, this individual's association with this case has been reported in the media already. <i>Avenatti</i> , 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25.
J. DOE 069	172, 173-6, 203, 211, 224, 229- 6, 249-4, 249-13, 369-1, 423-4, 435, 607-3	Employee of Epstein; Alleged Witness	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytile</i> , 810 F. Supp. 2d at 621. Second, this individual's association with Epstein has been widely reported in the media already. <i>Avenatti</i> , 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25. Defendant: This individual has passed away.
J. DOE 070	228, 235-13, 280-1, 307-8, 321-1, 339, 363, 364, 406, 435	Law Enforcement	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytile</i> , 810 F. Supp. 2d at 621. Second, this individual is a former law enforcement official and, specifically, the former FBI director.

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 071	249-13, 321-5, 321-6, 423-4	Employee of Epstein; Alleged Witness	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytile</i>, 810 F. Supp. 2d at 621. Second, the sealed material as to this individual is not salacious and consists primarily of Rule 26 disclosures.</p> <p>Defendant: All references are either R. 26 disclosures or search terms.</p>
J. DOE 072	249-13, 280-1, 321-1, 321-5, 321-6, 423-4	Employee of Epstein; Alleged Witness	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytile</i>, 810 F. Supp. 2d at 621. Second, the sealed material as to this individual is not salacious and consists primarily of Rule 26 disclosures.</p> <p>Defendant: All references are either R. 26 disclosures or search terms.</p>
J. DOE 075	232-7, 232-9, 235-4, 235-8, 235-10, 235-13, 307-8, 363-7, 423-1	Alleged Victim Affiliate	<p>Plaintiff: This material should be unsealed in full. This individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytile</i>, 810 F. Supp. 2d at 621.</p> <p>Defendant: No confirmation of receipt of Notice was received.</p>
J. DOE 076	450-1	Alleged Victim Affiliate	<p>Plaintiff: This material should be unsealed in full. This individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytile</i>, 810 F. Supp. 2d at 621. This individual's name also appears in a publicly available police report.</p> <p>Defendant: The only reference is a deposition question in answer to which the deponent asserted a Fifth Amendment protection (as with all questions in the deposition).</p>

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 077	173-5, 173-6, 340-5, 354, 355-2, 363-7, 369-1, 378, 408-1, 423-1, 435, 510-4	Alleged Epstein Affiliate	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytile</i>, 810 F. Supp. 2d at 621. Second, this individual's association with Epstein has been widely reported in the media already, and the Second Circuit unsealed this individual's name and information about their relationship with Epstein. <i>Avenatti</i>, 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25.</p> <p>Defendant: Served through organization.</p>
J. DOE 078	passim	Alleged Maxwell Affiliate; Alleged Witness	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytile</i>, 810 F. Supp. 2d at 621. Second, the Second Circuit unsealed this individual's name and information about their relationship with Epstein. <i>Avenatti</i>, 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25.</p>
J. DOE 079	249-13, 280-1, 321-1, 321-5, 321-6, 340-4, 423-4	Alleged Epstein Affiliate	<p>Plaintiff: This material should be unsealed in full. This individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytile</i>, 810 F. Supp. 2d at 621.</p> <p>Defendant: The only references are in R. 26 disclosures, search term, and a deposition question in answer to which the deponent knowledge of the Doe.</p>
J. DOE 080	249-13, 423-4	Alleged Witness	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytile</i>, 810 F. Supp. 2d at 621. Second, the sealed material as to this individual is not salacious and consists primarily of Rule 26 disclosures.</p>

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
			Defendant: The parties were unable to locate an address for this individual and therefore no notice was provided. Dkt. 1116, ¶ 7. The only references are contained in R. 26 disclosures and search terms.
J. DOE 081	655, 656-7, 656-8, 701-1, 714	Plaintiff: Alleged Victim Affiliate Defendant: Alleged Witness Affiliate	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lyle</i> , 810 F. Supp. 2d at 621. Further, this individual actually requested excerpts of materials mentioning them, which the parties sent them, and still raised no objection to unsealing after receiving those excerpts. Defendant: Served via email.
J. DOE 082	249-13, 280-1, 280-2, 321-1, 321-5, 321-6, 338-9, 398-5, 423-4, 450-1, 450-5, 655, 656-4, 656-8, 700, 701-1, 928, 947-1, 957	Plaintiff: Employee of Epstein; Alleged Perpetrator; Alleged Witness Defendant: Employee of Epstein; Alleged Witness	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lyle</i> , 810 F. Supp. 2d at 621. Further, this individual actually requested excerpts of materials mentioning them, which the parties sent them, and still raised no objection to unsealing after receiving those excerpts. Second, this individual's name and association with Epstein and Maxwell has been widely publicized by the media, this individual has been named as a defendant in public lawsuits relating to Epstein, and the Second Circuit unsealed substantial material relating to this individual. <i>Avenatti</i> , 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25. Third, this individual is alleged to have engaged in serious wrongdoing, and it is generally the privacy interests of "innocent third parties" that "weigh heavily in a court's balancing equation." <i>Amodeo</i> , 71 F.3d at 1050. Finally, this individual will have "a fair opportunity" to respond to any unsealed accusations, putting countervailing privacy interests "at the lowest." <i>Huntley</i> , 943 F. Supp. 2d at 387.

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 083	235-13, 280-1, 321-1, 423-1, 510-4	Alleged Victim Affiliate	Plaintiff: This material should be unsealed in full. This individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lyle</i> , 810 F. Supp. 2d at 621.
J. DOE 084	172, 203, 211, 224, 228, 229, 229-11, 231, 235-13, 249-4, 249-13, 257, 258, 258-3, 261, 280-1, 321-1, 321-4, 321-5, 321-6, 423-4, 567, 568, 568-4, 606, 631, 632, 632-1	Alleged Victim; Alleged Witness	<p>Plaintiff: This material should be unsealed in full. This individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lyle</i>, 810 F. Supp. 2d at 621.</p> <p>Defendant: This Doe's name was redacted by the Second Circuit when they released summary judgment materials containing the person's name. [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>
J. DOE 085	340-4	Unknown	<p>Plaintiff: This material should be unsealed in full. This individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lyle</i>, 810 F. Supp. 2d at 621.</p> <p>Defendant: The parties were unable to locate an address for this individual and therefore no notice was provided. Dkt. 1116, ¶ 7. Only reference is a deposition question in answer to which the deponent denied knowledge of the individual.</p>

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 086	235-13, 249-13, 280-1, 321-1, 321-5, 321-6, 363-7, 423-4	Alleged Epstein Affiliate	<p>Plaintiff: This material should be unsealed in full. This individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytile</i>, 810 F. Supp. 2d at 621.</p> <p>Defendant: The parties were unable to locate an address for this individual and therefore no notice was provided. Dkt. 1116, ¶ 7. Some material related to this individual is salacious.</p>
J. DOE 087	173-6, 180-1, 369-1, 423-1, 435, 510-4, 656-2	Alleged Epstein Affiliate	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytile</i>, 810 F. Supp. 2d at 621. Second, this individual's association with Epstein has been widely reported in the media already, along with pictures of this individual on Epstein's island. <i>Avenatti</i>, 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25.</p> <p>Defendant: This individual passed away in 2018 and therefore never received notice of the unsealing nor will have an opportunity to respond to any newly released items related to them. Dkt. 1116, ¶ 8.</p>
J. DOE 088	340-4	Unknown	<p>Plaintiff: This material should be unsealed in full. This individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytile</i>, 810 F. Supp. 2d at 621.</p> <p>Defendant: The parties were unable to locate and address for this individual and therefore no notice was provided. Dkt. 1116, ¶ 7. The only reference is a deposition question in answer to which the deponent denied knowledge of the individual.</p>

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 089	235-13 ██████████ 249-13, 280-1, 321-1, 321-5, 321-6, 340-4, 369-10, 423-4	Employee of Epstein	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lyle</i> , 810 F. Supp. 2d at 621. Further, this individual actually requested excerpts of materials mentioning them, which the parties sent them, and still raised no objection to unsealing after receiving those excerpts. Second, the sealed material as to this individual is not salacious and consists primarily of Rule 26 disclosures and lists of search terms. Finally, this individual's name and association with Epstein has been publicized by the media. <i>Avenatti</i> , 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25.
J. DOE 090	173-6, 340-3, 369-1	Alleged Epstein Affiliate	Plaintiff: This material should be unsealed in full. This individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lyle</i> , 810 F. Supp. 2d at 621. Defendant: Served
J. DOE 091	249-13, 280-1, 321-1, 321-5, 321-6, 423-4	Alleged Victim	Plaintiff: This material should be unsealed in full. This individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lyle</i> , 810 F. Supp. 2d at 621. Defendant: Served

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 092	None Identified	Alleged Epstein Affiliate	<p>Plaintiff: Any information about this individual should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytte</i>, 810 F. Supp. 2d at 621. Further, this individual actually requested excerpts of materials mentioning them, which the parties sent them, and still raised no objection to unsealing after receiving those excerpts. Second, the sealed material as to this individual is not salacious and consists mostly of privilege logs and documents discussing privilege logs. Finally, this individual's name and association with Epstein has been widely publicized by the media, this individual has been named as a defendant in public lawsuits relating to Epstein, and the Second Circuit unsealed this individual's name and information about their relationship with Epstein. <i>Avenatti</i>, 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25.</p> <p>Defendant: Served</p>
J. DOE 093 ²	701-1	Alleged Victim Affiliate	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytte</i>, 810 F. Supp. 2d at 621. Second, the sealed material as to this individual is not salacious. Plaintiff sent a non-party notice to this individual, but did not receive a delivery confirmation.</p>

² The Court previously unsealed materials relating to an individual identified as Doe 93 who had objected to unsealing, but Plaintiff had misidentified that individual's pseudonym number based on a prior, outdated version of the non-party list. Apr. 19, 2022, Hr'g Tr. at 7:1-10. The parties kept materials relating to that individual sealed, as ordered by the Court.

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 094	235-4	Alleged Victim Affiliate; Alleged Perpetrator	Plaintiff: This material should be unsealed in full. Plaintiff sent a non-party notice to this individual and received delivery confirmation. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytte</i> , 810 F. Supp. 2d at 621. Second, this individual is alleged to have engaged in serious wrongdoing, and it is generally the privacy interests of "innocent third parties" that "weigh heavily in a court's balancing equation." <i>Amodeo</i> , 71 F.3d at 1050.
J. DOE 095	338-9, 398-5	Alleged Epstein Affiliate	Plaintiff: This material should be unsealed in full. Plaintiff sent a non-party notice to this individual's counsel and received delivery confirmation. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytte</i> , 810 F. Supp. 2d at 621. Further, this individual actually requested excerpts of materials mentioning them, which the parties sent them, and still raised no objection to unsealing after receiving those excerpts. Second, the sealed material as to this individual is not salacious. Finally, this individual's name and association with Epstein has been widely publicized by the media and this individual has been named as a defendant in public lawsuits relating to Epstein. <i>Avenatti</i> , 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25 (unsealing documents relating to Doe who "has been the subject of intense media coverage").
J. DOE 096	576	Alleged Victim	Plaintiff: This material should be unsealed in full. Plaintiff sent a non-party notice to this individual and received delivery confirmation. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytte</i> , 810 F. Supp. 2d at 621. Defendant: Only reference is the Doe's reported name on a flight log.

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 098	340-4	Unknown	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytte</i>, 810 F. Supp. 2d at 621. Plaintiff was unable to locate any address for this individual.</p> <p>Defendant: Plaintiff located no address for this person. Only reference is a deposition question to which the deponent denied knowledge of the Doe.</p>
J. DOE 099	passim	Employee of Epstein; Alleged Perpetrator	<p>Plaintiff: This material should be unsealed in full. Plaintiff sent a non-party notice to this individual's counsel and received delivery confirmation. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytte</i>, 810 F. Supp. 2d at 621. Second, this individual's name and association with Epstein and Maxwell has been widely publicized by the media, this individual has been named as a defendant in public lawsuits relating to Epstein, and the Second Circuit unsealed substantial material relating to this individual. <i>Avenatti</i>, 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25. Third, this individual is alleged to have engaged in serious wrongdoing, and it is generally the privacy interests of "innocent third parties" that "weigh heavily in a court's balancing equation." <i>Amodeo</i>, 71 F.3d at 1050. Finally, this individual will have "a fair opportunity" to respond to any unsealed accusations, putting countervailing privacy interests "at the lowest." <i>Huntley</i>, 943 F. Supp. 2d at 387.</p>
J. DOE 100	340-4	Unknown	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytte</i>, 810 F. Supp. 2d at 621.</p> <p>Defendant: Plaintiff located no address for this person. Only reference is a deposition question to which the deponent denied knowledge of the Doe.</p>

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 101	235-13, 280-1, 321-1, 423-1, 510-4	Alleged Victim Affiliate	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytile</i> , 810 F. Supp. 2d at 621. Further, this individual actually requested excerpts of materials mentioning them, which the parties sent them, and still raised no objection to unsealing after receiving those excerpts. Second, the sealed material as to this individual is not salacious and consists primarily of Rule 26 disclosures and lists of search terms. Plaintiff sent a non-party notice to this individual. Although Plaintiff did not receive delivery confirmation, this individual received the notice because they requested excerpts and did not lodge and objection to unsealing.
J. DOE 102	280-2, 338-9, 398-5	Alleged Epstein Affiliate	Plaintiff: This material should be unsealed in full. Plaintiff sent a non-party notice to this individual's counsel and received delivery confirmation. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytile</i> , 810 F. Supp. 2d at 621. Second, this individual's name and association with Epstein has already been publicized by the media.
J. DOE 103	235-13, 363-7	Alleged Epstein Affiliate	Plaintiff: This material should be unsealed in full. Plaintiff sent a non-party notice to this individual's counsel and received delivery confirmation. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytile</i> , 810 F. Supp. 2d at 621. Second, this individual's association with Epstein has been widely reported in the media already, and the Second Circuit unsealed this individual's name and information about their relationship with Epstein. <i>Avenatti</i> , 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25.
J. DOE 104	247-1	Unknown	Plaintiff: This material should be unsealed in full. This individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytile</i> , 810 F. Supp. 2d at 621.

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
			Defendant: Plaintiff acknowledged that this person is deceased and therefore did not receive notice. Unable to locate Doe's name in the listed pleading.
J. DOE 106	249-13, 280-1, 321-1, 321-5, 321-6, 423-4, 435	Alleged Epstein Affiliate	Plaintiff: This material should be unsealed in full. Plaintiff sent a non-party notice to this individual and received delivery confirmation. This individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytte</i> , 810 F. Supp. 2d at 621.
J. DOE 108	701-1	Alleged Witness	Plaintiff: This material should be unsealed in full. Plaintiff sent a non-party notice to this individual and received delivery confirmation. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytte</i> , 810 F. Supp. 2d at 621. Further, this individual actually requested excerpts of materials mentioning them, which the parties sent them, and still raised no objection to unsealing after receiving those excerpts.
J. DOE 109	185-3, 363, 450-1, 450-5, 568-3	Alleged Epstein Affiliate	Plaintiff: This material should be unsealed in full. Plaintiff sent a non-party notice to this individual and received delivery confirmation. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytte</i> , 810 F. Supp. 2d at 621. Second, this individual's name and association with Epstein has already been widely publicized by the media. <i>Avenatti</i> , 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25.

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 110	173-6, 249-13, 280-1, 321-1, 321-5, 321-6, 339, 340-3, 340-4, 363-7, 369-1, 423-4	Alleged Epstein Affiliate	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lyle</i>, 810 F. Supp. 2d at 621. Further, this individual actually requested excerpts of materials mentioning them, which the parties sent them, and still raised no objection to unsealing after receiving those excerpts. Second, this individual's name and association with Epstein has been widely publicized by the media. <i>Avenatti</i>, 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25. Plaintiff sent a non-party notice to this individual. Although Plaintiff did not receive delivery confirmation, this individual received the notice because they requested excerpts and did not lodge and objection to unsealing.</p>
J. DOE 111	249-13, 280-1, 321-1, 321-5, 321-6, 423-4	Employee of Epstein	<p>Plaintiff: This material should be unsealed in full. This individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lyle</i>, 810 F. Supp. 2d at 621.</p> <p>Defendant: Plaintiff located no address for this person. The sole references appear to be in R. 26 disclosures and search terms.</p>
J. DOE 112	235-13, 249-13, 280-1, 321-1, 423-4	Alleged Epstein Affiliate	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lyle</i>, 810 F. Supp. 2d at 621. Second, this individual's name and association with Epstein has been publicized by the media. <i>Avenatti</i>, 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25.</p> <p>Defendant: Plaintiff located no address for this person. The sole references appear to be in R. 26 disclosures and search terms.</p>

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 113	249-13, 280-1, 321-1, 321-5, 321-6, 423-4, 435	Alleged Epstein Affiliate; Alleged Witness	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytle</i>, 810 F. Supp. 2d at 621. Second, this individual is alleged to have engaged in serious wrongdoing, and it is generally the privacy interests of “innocent third parties” that “weigh heavily in a court’s balancing equation.” <i>Amodeo</i>, 71 F.3d at 1050. Plaintiff sent a non-party notice to this individual, but did not receive a delivery confirmation.</p> <p>Defendant: The references all are included in R. 26 disclosures, search terms, and a hearsay statement that the name appears in Epstein’s address book.</p>
J. DOE 114	173-6, 369-1	Alleged Epstein Affiliate	<p>Plaintiff: This material should be unsealed in full. This individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytle</i>, 810 F. Supp. 2d at 621.</p> <p>Defendant: Plaintiff located no address for this person. The sole reference is that this individual’s name appears to be contained on a flight log.</p>
J. DOE 115	435	Alleged Epstein Affiliate	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytle</i>, 810 F. Supp. 2d at 621. Further, the sealed material as to this individual is not salacious. Plaintiff sent a non-party notice to this individual, but did not receive a delivery confirmation.</p> <p>Defendant: The sole reference to this individual is a hearsay statement that the Doe appeared in Epstein’s address book.</p>

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 116	398-4, 338, 338-8, 468, 469-1, 660-1	Employee of Epstein	Plaintiff: This material should be unsealed in full. Plaintiff sent a non-party notice to this individual and received delivery confirmation. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytte</i> , 810 F. Supp. 2d at 621. Further, this individual actually requested excerpts of materials mentioning them, which the parties sent them, and still raised no objection to unsealing after receiving those excerpts. Finally, the sealed material as to this individual is not salacious.
J. DOE 117	450-1, 471-1	Law Enforcement Officer	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytte</i> , 810 F. Supp. 2d at 621. Second, this individual is a former law enforcement official and, specifically, a former Assistant U.S. Attorney, and this individual's role in the Epstein case is part of a public Office of Professional Responsibility Report. Plaintiff was unable to locate an address for this individual.
J. DOE 118	249-13, 280-1, 321-1, 321-5, 321-6, 423-4	Alleged Epstein Affiliate	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytte</i> , 810 F. Supp. 2d at 621. Second, the sealed material as to this individual is not salacious and consists primarily of Rule 26 disclosures. Plaintiff sent a non-party notice to this individual, but did not receive a delivery confirmation. Defendant: Plaintiff located no address for this person.
J. DOE 119	249-13, 280-1, 321-1, 321-5, 321-6, 340-4, 423-4	Alleged Epstein Affiliate	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytte</i> , 810 F. Supp. 2d at 621. Second, the sealed material as to this individual is not salacious and consists primarily of Rule 26

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
			disclosures. Plaintiff sent a non-party notice to this individual, but did not receive a delivery confirmation.
J. DOE 120	576, 655, 656-4, 656-5, 656-6, 656-7, 700, 701-1, 947-1	Plaintiff: Employee of Epstein; Alleged Perpetrator; Alleged Witness Defendant: Employee of Epstein; Alleged Witness	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lyle</i> , 810 F. Supp. 2d at 621. Second, this individual's name and association with Epstein and Maxwell has been widely publicized by the media and this individual has been named as a defendant in public lawsuits relating to Epstein. <i>Avenatti</i> , 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25 (unsealing documents relating to Doe who "has been the subject of intense media coverage"). Third, this individual is alleged to have engaged in serious wrongdoing, and it is generally the privacy interests of "innocent third parties" that "weigh heavily in a court's balancing equation." <i>Amodeo</i> , 71 F.3d at 1050. Finally, this individual will have "a fair opportunity" to respond to any unsealed accusations, putting countervailing privacy interests "at the lowest." <i>Huntley</i> , 943 F. Supp. 2d at 387. Plaintiff sent a non-party notice to this individual, but did not receive a delivery confirmation.
J. DOE 121	381-1	Law Enforcement	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lyle</i> , 810 F. Supp. 2d at 621. Second, this individual's name appears only in an already publicly available police report, and the individual appears to be a member of law enforcement (specifically, a police officer). Finally, the only document that substantively discussing this individual is already publicly available on the docket with this individual's name unredacted. <i>See</i> D.E. 1199-8. Plaintiff sent a non-party notice to this individual, but did not receive a delivery confirmation.

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 122	150-1, 173-6, 203, 211, 224, 235-4, 280-1, 320, 321-1, 321-6, 340-3, 340-4, 369, 369-1, 407, 407-9, 655, 656-5, 656-6, 656-9, 700, 701-1, 701-2	Employee of Epstein; Alleged Perpetrator; Alleged Witness	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lyle</i> , 810 F. Supp. 2d at 621. Second, this individual's name and association with Epstein and Maxwell has been widely publicized by the media and this individual has been named as a defendant in public lawsuits relating to Epstein. <i>Avenatti</i> , 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25. Third, this individual is alleged to have engaged in serious wrongdoing, and it is generally the privacy interests of "innocent third parties" that "weigh heavily in a court's balancing equation." <i>Amodeo</i> , 71 F.3d at 1050. Finally, this individual will have "a fair opportunity" to respond to any unsealed accusations, putting countervailing privacy interests "at the lowest." <i>Huntley</i> , 943 F. Supp. 2d at 387. Plaintiff sent a non-party notice to this individual, but did not receive a delivery confirmation.
J. DOE 123	260-2, 270-6, 272-9	Alleged Victim Affiliate	Plaintiff: The name of this individual should be unsealed. This individual is a medical provider whose name has already been revealed in documents on the docket, unredacted. <i>See</i> D.E. 1090-45. Plaintiff sent a non-party notice to this individual, but did not receive a delivery confirmation.
J. DOE 124	701-1	Alleged Witness	Plaintiff: This material should be unsealed in full. This individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lyle</i> , 810 F. Supp. 2d at 621. Defendant: Plaintiff located no address for this person. The witness's allegations against this individual are salacious.

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 125	235-13, 249-13, 280-1, 321-1, 321-5, 321-6, 423-4	Alleged Epstein Affiliate	Plaintiff: This material should be unsealed in full. Plaintiff sent a non-party notice to this individual and received delivery confirmation. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytle</i> , 810 F. Supp. 2d at 621. Second, this individual's name and association with Epstein has been publicized by the media. <i>Avenatti</i> , 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25.
J. DOE 126	249-13, 280-1, 321-1, 321-5, 321-6, 423-4	Alleged Epstein Affiliate	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytle</i> , 810 F. Supp. 2d at 621. Second, this individual's name and association with Epstein has been publicized by the media. <i>Avenatti</i> , 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25. Plaintiff sent a non-party notice to this individual, but did not receive a delivery confirmation.
J. DOE 127	235-13, 280-1, 321-1	Alleged Victim Affiliate; Witness	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytle</i> , 810 F. Supp. 2d at 621. Second, this individual's name appears in a publicly available police report. Plaintiff sent a non-party notice to this individual, but did not receive a delivery confirmation.
J. DOE 128	249-13, 280-1, 321-1, 321-5, 321-6, 423-4	Employee of Epstein	Plaintiff: This material should be unsealed in full. Plaintiff sent a non-party notice to this individual and received delivery confirmation. This individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytle</i> , 810 F. Supp. 2d at 621.
J. DOE 129	249-13, 280-1, 321-1, 321-5, 321-6, 423-4	Employee of Epstein	Plaintiff: This material should be unsealed in full. Plaintiff sent a non-party notice to this individual and received delivery confirmation. This individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytle</i> , 810 F. Supp. 2d at 621.

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 130	450-1, 471-1	Law Enforcement	Plaintiff: This material should be unsealed in full. Plaintiff sent a non-party notice to this individual's counsel and received delivery confirmation. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytte</i> , 810 F. Supp. 2d at 621. Second, this individual is a former law enforcement official and, specifically, a former Assistant U.S. Attorney, and this individual's role in the Epstein case is part of a public Office of Professional Responsibility Report.
J. DOE 131	203, 211, 232, 235, 235-7, 235-13, 249-4, 258-10, 280-1, 320, 321-1, 368, 369, 369-8, 392, 393, 393-1	Alleged Victim Affiliate	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytte</i> , 810 F. Supp. 2d at 621. Second, portions of this individual's deposition were released by the Second Circuit, meaning their name and association with this case is already public. <i>Avenatti</i> , 2020 WL 70952, at *6; 7/1/21 Hearing Tr. at 6-7. Plaintiff sent a non-party notice to this individual, but did not receive a delivery confirmation.
J. DOE 132	173-5, 173-6, 235-13, 280-1, 321-1, 321-5, 321-6, 340-5, 363-7, 369-1, 435, 450-1, 510-3, 514-3, 701-1	Plaintiff: Alleged Epstein Affiliate; Alleged Perpetrator Alleged Epstein Affiliate;	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytte</i> , 810 F. Supp. 2d at 621. Second, this individual is alleged to have engaged in serious wrongdoing, and it is generally the privacy interests of "innocent third parties," not those accused of serious misconduct, that "weigh heavily in a court's balancing equation." <i>United States v. Amodeo</i> , 71 F.3d 1044, 1050 (2d Cir. 1995). Finally, allegations about this individual have been widely reported in the media, and the Second Circuit unsealed allegations about this individual in this case. <i>Avenatti</i> , 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25. Defendant: Plaintiff acknowledged that this person is deceased and therefore did not receive notice.

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 134	173-6, 228, 249-13, 280-1, 321-1, 321-5, 321-6, 369-1, 423-4	Alleged Epstein Affiliate; Alleged Witness	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lyle</i> , 810 F. Supp. 2d at 621. Second, this individual's name and association with Epstein and Maxwell has been publicized by the media. <i>Avenatti</i> , 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25. Third, this individual is alleged to have engaged in serious wrongdoing, and it is generally the privacy interests of "innocent third parties" that "weigh heavily in a court's balancing equation." <i>Amodeo</i> , 71 F.3d at 1050. Finally, this individual will have "a fair opportunity" to respond to any unsealed accusations, putting countervailing privacy interests "at the lowest." <i>Huntley</i> , 943 F. Supp. 2d at 387. Plaintiff sent a non-party notice to this individual, but did not receive a delivery confirmation.
J. DOE 135	173-6, 235-13, 321-5, 321-6, 340-3, 369-1	Alleged Victim	Plaintiff: This material should be unsealed in full. This individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lyle</i> , 810 F. Supp. 2d at 621. Defendant: Plaintiff located no address for this person.

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 136	184, 185-3, 249-13, 280-1, 321-1, 321-5, 321-6, 406, 407, 408, 408-1, 423-4, 435	Plaintiff: Employee of Epstein; Alleged Perpetrator; Alleged Witness Defendant: Employee of Epstein Alleged Witness	<p>Plaintiff: This individual is the same individual as Doe 157. This material should be unsealed in full. Plaintiff sent a non-party notice to this individual and received delivery confirmation. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytle</i>, 810 F. Supp. 2d at 621. Second, this individual's name and association with Epstein and Maxwell has been widely publicized by the media and this individual has been named as a defendant in public lawsuits relating to Epstein. <i>Avenatti</i>, 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25 (unsealing documents relating to Doe who "has been the subject of intense media coverage"). Third, this individual is alleged to have engaged in serious wrongdoing, and it is generally the privacy interests of "innocent third parties" that "weigh heavily in a court's balancing equation." <i>Amodeo</i>, 71 F.3d at 1050. Finally, this individual will have "a fair opportunity" to respond to any unsealed accusations, putting countervailing privacy interests "at the lowest." <i>Huntley</i>, 943 F. Supp. 2d at 387.</p>
J. DOE 137	363-7	Alleged Epstein Affiliate	<p>Plaintiff: This material should be unsealed in full. This individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytle</i>, 810 F. Supp. 2d at 621. The information relating to his individual is also not salacious.</p> <p>Defendant: Plaintiff located no address for this person. The only reference is a deposition question to which the Party denied knowledge of.</p>
J. DOE 138	381-1	Alleged Victim Affiliate	<p>Plaintiff: This material should be unsealed in full. Plaintiff sent a non-party notice to this individual and received delivery confirmation. This individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytle</i>, 810 F. Supp. 2d at 621. Further, this individual's name appears only in a public police report and was already released by this Court. <i>See</i> D.E. 1199-8.</p>

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 139	249-13, 280-1, 321-1, 321-5, 321-6, 423-4	Employee of Epstein	Plaintiff: This material should be unsealed in full. Plaintiff sent a non-party notice to this individual and received delivery confirmation. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytte</i> , 810 F. Supp. 2d at 621. Second, the Second Circuit unsealed this individual's name and relationship with Epstein. <i>Avenatti</i> , 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25.
J. DOE 140	249-13, 280-1, 280-2, 321-1, 423-4	Employee of Epstein	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytte</i> , 810 F. Supp. 2d at 621. Second, the Second Circuit unsealed this individual's name and relationship with Epstein. <i>Avenatti</i> , 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25. Plaintiff sent a non-party notice to this individual, but did not receive a delivery confirmation.
J. DOE 141	249-13, 363-7, 423-4	Employee of Epstein	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytte</i> , 810 F. Supp. 2d at 621. Second, the Second Circuit previously unsealed this individual's name. <i>Avenatti</i> , 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25. Plaintiff sent a non-party notice to this individual, but did not receive a delivery confirmation.
J. DOE 142	228, 249-13, 321-1, 321-5, 321-6, 340-4, 423-4	Alleged Epstein Affiliate	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytte</i> , 810 F. Supp. 2d at 621. Second, the sealed material as to this individual is not salacious. Plaintiff sent a non-party notice to this individual, but did not receive a delivery confirmation.

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 143	passim	Alleged Perpetrator; Alleged Epstein Affiliate; Alleged Witness	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytile</i> , 810 F. Supp. 2d at 621. Second, this individual's association with Epstein and Maxwell has been widely reported in the media already, and their name came up at Maxwell's public criminal trial. <i>Avenatti</i> , 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25. This individual was also named as a defendant in public, federal lawsuit involving the same conduct underlying this action. Third, this individual is alleged to have engaged in serious wrongdoing, and it is generally the privacy interests of "innocent third parties" that "weigh heavily in a court's balancing equation." <i>Amodeo</i> , 71 F.3d at 1050. Finally, this individual will have "a fair opportunity" to respond to any unsealed accusations, putting countervailing privacy interests "at the lowest." <i>Huntley</i> , 943 F. Supp. 2d at 387.
J. DOE 145	249-13, 321-1, 321-5, 321-6, 368, 369, 369-12, 423-4, 513, 514, 514-5, 568-5, 607-3	Employee of Epstein	Plaintiff: This material should be unsealed in full. Plaintiff sent a non-party notice to this individual and received delivery confirmation. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytile</i> , 810 F. Supp. 2d at 621. Portions of this individual's 2009 deposition in a matter against Epstein were also unsealed by the Second Circuit.
J. DOE 146	701-1	Plaintiff: Alleged Victim Affiliate Defendant: Alleged Witness Affiliate	Plaintiff: This material should be unsealed in full. This individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytile</i> , 810 F. Supp. 2d at 621. Defendant: Plaintiff located no address for this person.

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 148	172, 173-5, 185-11, 228, , 235-4, 235-13, 249-13, 363-7, 423-4, 435, 450-1, 701-1	Plaintiff: Alleged Perpetrator; Alleged Epstein Affiliate; Alleged Witness Defendant: Alleged Epstein Affiliate; Alleged Witness	<p>Plaintiff: This material should be unsealed in full. Plaintiff sent a non-party notice to this individual, received delivery confirmation, and this individual requested excerpts. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytte</i>, 810 F. Supp. 2d at 621. Second, this individual's association with Epstein and Maxwell has been widely reported in the media already, and their name was unsealed by the Second Circuit previously. <i>Avenatti</i>, 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25. Third, this individual is alleged to have engaged in serious wrongdoing, and it is generally the privacy interests of "innocent third parties" that "weigh heavily in a court's balancing equation." <i>Amodeo</i>, 71 F.3d at 1050. Finally, this individual will have "a fair opportunity" to respond to any unsealed accusations, putting countervailing privacy interests "at the lowest." <i>Huntley</i>, 943 F. Supp. 2d at 387.</p>
J. DOE 149	173-5	Law Enforcement	<p>Plaintiff: This material should be unsealed in full. This individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytte</i>, 810 F. Supp. 2d at 621.</p> <p>Defendant: Plaintiff located no address for this person.</p>
J. DOE 150	229-1	Alleged Witness	<p>Plaintiff: This material should be unsealed in full. This individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytte</i>, 810 F. Supp. 2d at 621. The deposition of this individual's spouse was released with redactions by this Court and previously by the Second Circuit, and the only information in the transcript about this individual is not salacious. Plaintiff sent a non-party notice to this individual, but did not receive a delivery confirmation.</p>

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 152	235-13, 423-1, 510-4	Alleged Victim Affiliate	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytile</i>, 810 F. Supp. 2d at 621. Second, this individual has given statements to the media in connection with this matter. <i>Avenatti</i>, 2020 WL 70952, at *6; 7/1/21 Hearing Tr. at 6-7.</p> <p>Defendant: Plaintiff located no address for this person.</p>
J. DOE 153	203, 211, 235-4, 235-13, 249-4, 280-1, 321-1, 338, 423-1, 423-4, 510-4	Alleged Victim Affiliate; Alleged Witness	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytile</i>, 810 F. Supp. 2d at 621. Second, this individual has given statements and interviews to the media in connection with this matter, and portions of this individual's deposition were released by the Second Circuit. <i>Avenatti</i>, 2020 WL 70952, at *6; 7/1/21 Hearing Tr. at 6-7; [REDACTED] Plaintiff sent a non-party notice to this individual, but did not receive a delivery confirmation.</p>
J. DOE 154	173-6, 249-13, 258-4, 280-1, 321-1, 321-5, 321-6, 340-3, 340-4, 369-1, 423-4, 450-1, 482-4	Alleged Underage Victim; Alleged Witness	<p>Plaintiff: This material should be unsealed in full. Plaintiff sent a non-party notice to this individual and received delivery confirmation. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytile</i>, 810 F. Supp. 2d at 621. Second, this individual's allegations against Epstein and others have been previously reported on by the press, and this individual has given interviews to the media. <i>Avenatti</i>, 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25; [REDACTED]</p>

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 155	172, 173-6, 203, 211, 224, 229-12, 249-4, 249-13, 368, 369, 369-1, 369-2, 369-13, 388, 389, 389-5, 389-6, 392, 393, 393-1, 423-4	Employee of Epstein; Alleged Witness	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytile</i> , 810 F. Supp. 2d at 621. Second, this individual testified publicly at Maxwell's criminal trial, weighing against continued sealing. <i>Avenatti</i> , 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25. Portions of this individual's deposition in this matter were also unsealed by the Second Circuit. Plaintiff sent a non-party notice to this individual, but did not receive a delivery confirmation.
J. DOE 156	152, 153-7, 172, 173-6, 185-3, 247-1, 249-13, 339, 340-3, 340-4, 363-7, 368, 369, 369-1, 369-16, 379-3, 406, 407, 407-1, 407-8, 408, 408-1, 423-4, 435, 450-1, 567, 568, 568-5, 606, 607, 607-3, 631, 656-2, 721-1	Employee of Epstein; Alleged Witness	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytile</i> , 810 F. Supp. 2d at 621. Second, this individual's deposition in a prior Epstein-related matter is publicly available, and portions of that deposition were unsealed by the Second Circuit. <i>Avenatti</i> , 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25. Defendant: Plaintiff acknowledged that this person is deceased and therefore did not receive notice.

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 157	249-13, 321-5, 321-6, 338, 338-9, 398-5, 407, 407-9, 423-4, 450-1, 450-5, 660-1	<p>Plaintiff: Employee of Epstein; Alleged Perpetrator; Alleged Witness</p> <p>Defendant: Employee of Epstein Alleged Witness</p>	<p>Plaintiff: This individual is the same individual as Doe 136. This material should be unsealed in full. Plaintiff sent a non-party notice to this individual and received delivery confirmation. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytte</i>, 810 F. Supp. 2d at 621. Second, this individual's name and association with Epstein and Maxwell has been widely publicized by the media and this individual has been named as a defendant in public lawsuits relating to Epstein. <i>Avenatti</i>, 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25 (unsealing documents relating to Doe who "has been the subject of intense media coverage"). Third, this individual is alleged to have engaged in serious wrongdoing, and it is generally the privacy interests of "innocent third parties" that "weigh heavily in a court's balancing equation." <i>Amodeo</i>, 71 F.3d at 1050. Finally, this individual will have "a fair opportunity" to respond to any unsealed accusations, putting countervailing privacy interests "at the lowest." <i>Huntley</i>, 943 F. Supp. 2d at 387.</p>
J. DOE 158	173-6, 369-1, 235-13, 320, 450-1	Alleged Epstein Affiliate	<p>Plaintiff: This material should be unsealed in full. Plaintiff sent a non-party notice to this individual and received delivery confirmation. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytte</i>, 810 F. Supp. 2d at 621. Second, this individual's relationship with Epstein has been widely publicized by the media. <i>Avenatti</i>, 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25.</p>
J. DOE 159, J. DOE 160	701-1	Alleged Witness Affiliate	<p>Plaintiff: This material should be unsealed in full. This individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytte</i>, 810 F. Supp. 2d at 621.</p> <p>Defendant: Plaintiff located no address for these persons, who are believed to live abroad.</p>

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 161	381-1	Alleged Victim Affiliate	<p>Plaintiff: This material should be unsealed in full. This individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytte</i>, 810 F. Supp. 2d at 621. This individual's name also appears in a publicly available police report. Finally, the only document that substantively discusses this individual is already publicly available on the docket with this individual's name unredacted. <i>See</i> D.E. 1199-10.</p> <p>Defendant: Plaintiff located no address for this person. Only reference appears to relate to juvenile criminal conduct by this individual in regards to Plaintiff, unclear why not redacted by the law enforcement agency.</p>
J. DOE 162	143, 144-6, 150-1, 172, 173, 173-5, 173-6, 189, 203, 204, 204-1, 211, 212, 212-1, 224, 249-4, 249-13, 257, 258, 258-2, 261, 272-7, 280-1, 315, 316, 316-1, 316-6, 316-8, 321-1, 321-5, 321-6, 338, 338-1, 338-7, 339, 340, 340-3, 340-4, 340-5, 340-6, 363-7, 368, 369, 369-1, 369-2, 369-5, 378, 388, 389,	Alleged Victim; Alleged Witness	<p>Plaintiff: This material should be unsealed in full. Plaintiff sent a non-party notice to this individual's counsel and received delivery confirmation. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytte</i>, 810 F. Supp. 2d at 621. Further, this individual actually requested excerpts of materials mentioning them, which the parties sent them, and still raised no objection to unsealing after receiving those excerpts. Finally, this individual's allegations against Epstein and others has been previously reported on by the press, this individual gave an interview to the Daily Mail in 2021, and the Second Circuit unsealed substantial information relating to this individual. <i>Avenatti</i>, 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25; [REDACTED]</p>

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
	389-1, 392 393, 393-1, 400, 401, 401-3, 401-4, 423-4, 450-6, 492, 493, 493-1, 568-5, 660-3, 845, 856		
J. DOE 163	405-1	Media	Plaintiff: This individual is a journalist, and thus materials relating to this individual should be unsealed in full.
J. DOE 164	316-7, 340-4, 369-3	Alleged Underaged Victim; Alleged Witness	Plaintiff: This material should be unsealed in full. This individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytte</i> , 810 F. Supp. 2d at 621. Plaintiff sent a non-party notice to this individual, but did not receive a delivery confirmation.
J. DOE 165	340-4	Unknown	<p>Plaintiff: This material should be unsealed in full. Plaintiff sent a non-party notice to this individual and received delivery confirmation. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytte</i>, 810 F. Supp. 2d at 621. Second, the sealed material as to this individual is not salacious.</p> <p>Defendant: Only reference is a deposition question after which the deponent denied knowledge of the individual.</p>

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 166	173-5, 173-6, 340-3, 340-4, 363-7, 369-1, 369-10, 407-6, 435, 632-1	Alleged Epstein Affiliate	<p>Plaintiff: This material should be unsealed in full. Plaintiff sent a non-party notice to this individual's production company and received delivery confirmation. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytle</i>, 810 F. Supp. 2d at 621. Second, this individual's association with Epstein and Maxwell has been widely reported in the media already, and their name came up during Maxwell's public criminal trial. <i>Avenatti</i>, 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25.</p>
J. DOE 167	173-6, 249-13, 280-1, 321-1, 321-5, 321-6, 363-7, 369-1, 423-4	Alleged Epstein Affiliate; Alleged Witness	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytle</i>, 810 F. Supp. 2d at 621. Second, this individual is alleged to have engaged in serious wrongdoing, and it is generally the privacy interests of "innocent third parties" that "weigh heavily in a court's balancing equation." <i>Amodeo</i>, 71 F.3d at 1050. Finally, this individual will have "a fair opportunity" to respond to any unsealed accusations, putting countervailing privacy interests "at the lowest." <i>Huntley</i>, 943 F. Supp. 2d at 387. Plaintiff was unable to locate an address for this individual.</p> <p>Defendant: Apart from R. 26 disclosures and search terms, a party deponent obviously confused this individual's name with another person with a similar name.</p>
J. DOE 168	235-13, 249-13, 280-1, 321-1, 321-5, 321-6, 423-4	Employee of Epstein; Alleged Witness	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytle</i>, 810 F. Supp. 2d at 621. Plaintiff was unable to locate an address for this individual.</p> <p>Defendant: All references are either R. 26 disclosures or search terms.</p>

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 169	363-7, 435	Alleged Epstein Affiliate	Plaintiff: This material should be unsealed in full. Plaintiff sent a non-party notice to this individual and received delivery confirmation. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytte</i> , 810 F. Supp. 2d at 621. Second, this individual's association with Epstein has been widely reported in the media already. <i>Avenatti</i> , 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25.
J. DOE 170	229-10, 450-3, 482-4	Alleged Epstein Affiliate	This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytte</i> , 810 F. Supp. 2d at 621. Second, emails containing this individual's name and association with Epstein were previously unsealed by this Court. Third, the sealed material as to this individual is not salacious. Plaintiff sent a non-party notice to this individual, but did not receive a delivery confirmation.
J. DOE 172	173-6, 369-1	Alleged Epstein Affiliate	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytte</i> , 810 F. Supp. 2d at 621. Second, the sealed material as to this individual is not salacious. Plaintiff was unable to locate an address for this individual. Defendant: The only reference is a deposition question to which the deponent denied knowledge of the Doe.
J. DOE 173	235-13, 280-1, 321-1, 381-3	Alleged Victim Affiliate; Alleged Perpetrator	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytte</i> , 810 F. Supp. 2d at 621. Second, the only document that substantively discusses this individual is already publicly available on the docket with this individual's name unredacted. See D.E. 1199-10. Plaintiff was unable to locate an address for this individual.

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 174	173-5, 340-5, 363-7, 407-6, 435, 656-2, 657, 701-1, 947-1	Alleged Epstein Affiliate	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytile</i> , 810 F. Supp. 2d at 621. Second, this individual's association with Epstein and Maxwell has been widely reported in the media already, and their name came up during Maxwell's public criminal trial. <i>Avenatti</i> , 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25. Plaintiff sent a non-party notice to this individual, but did not receive a delivery confirmation.
J. DOE 175	173-6, 340-3, 340-4, 369-1, 369-10	Alleged Epstein Affiliate	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytile</i> , 810 F. Supp. 2d at 621. Second, this individual's association with Epstein and Maxwell has been widely reported in the media already, and their name came up during Maxwell's public criminal trial. <i>Avenatti</i> , 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25. Plaintiff sent a non-party notice to this individual, but did not receive a delivery confirmation.
J. DOE 176	249-13, 321-5, 321-6, 423-4	Employee of Epstein	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytile</i> , 810 F. Supp. 2d at 621. Second, the sealed material as to this individual is not salacious and consists primarily of Rule 26 disclosures. Plaintiff sent a non-party notice to this individual, but did not receive a delivery confirmation. Defendant: All references are either in R. 26 disclosure or search terms.

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 177	235-4, 235-13, 423-1, 510-4	Alleged Victim Affiliate	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytile</i> , 810 F. Supp. 2d at 621. Second, the sealed material as to this individual is not salacious. Plaintiff was unable to locate an address for this individual.
J. DOE 178	258-3, 568-4	Alleged Underage Victim	Plaintiff: This material should be unsealed in full. Plaintiff sent a non-party notice to this individual and received delivery confirmation. This individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytile</i> , 810 F. Supp. 2d at 621.
J. DOE 179	173-8, 340-6, 400, 401-3, 450-6	Alleged Epstein Affiliate	Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytile</i> , 810 F. Supp. 2d at 621. Second, this individual's name was unsealed in materials released by the Second Circuit.
J. DOE 180	173-6, 340-3, 369-1	Epstein Employee	Plaintiff: This is the same individual as Doe 181, and the deposition examiner mistakenly used the incorrect name in the deposition transcripts at issue. This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i> , 121 F.3d at 826; <i>Lytile</i> , 810 F. Supp. 2d at 621. Second, this individual testified publicly at Maxwell's criminal trial, weighing against continued sealing. <i>Avenatti</i> , 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25. Portions of this individual's deposition in this matter were also unsealed by the Second Circuit. Plaintiff was unable to locate an address for this individual.

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 181	173-6, 249-13, 280-1, 280-2, 321-1, 321-5, 321-6, 363-7, 407-9, 423-4, 435	Epstein Employee; Alleged Witness	<p>Plaintiff: This material should be unsealed in full. Plaintiff sent a non-party notice to this individual and received delivery confirmation. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytte</i>, 810 F. Supp. 2d at 621. Second, this individual testified publicly at Maxwell's criminal trial, weighing against continued sealing. <i>Avenatti</i>, 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25. Portions of this individual's deposition in this matter were also unsealed by the Second Circuit.</p> <p>Defendant: Almost all of the references are R. 26 disclosures or search terms.</p>
J. DOE 182	340-4	Alleged Epstein Affiliate	<p>Plaintiff: This material should be unsealed in full. This individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytte</i>, 810 F. Supp. 2d at 621. Plaintiff sent a non-party notice to this individual, but did not receive a delivery confirmation.</p> <p>Defendant: The only reference is in a deposition question that was never answered.</p>
J. DOE 184	435	Alleged Epstein Affiliate	<p>Plaintiff: This material should be unsealed in full. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytte</i>, 810 F. Supp. 2d at 621. Second, this individual's association with Epstein has been reported in the media already. <i>Avenatti</i>, 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25.</p> <p>Defendant: This person passed away in 2016. The only reference is a hearsay assertion that the individual's name was in Epstein's address book.</p>

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
J. DOE 185	235-13, 249-13, 321-1, 321-5, 321-6, 423-4	Alleged Victim; Alleged Witness	<p>Plaintiff: This material should be unsealed in full. Plaintiff sent a non-party notice to this individual's counsel and received delivery confirmation. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytle</i>, 810 F. Supp. 2d at 621. Second, this individual's allegations against Epstein and others have been previously reported on by the press, this individual has given multiple interviews to the media, and this individual has been a plaintiff in public lawsuits relating to Epstein's sex trafficking. <i>Avenatti</i>, 2020 WL 70952, at *6; 11/18/22 Hearing Tr. at 6:19-25; [REDACTED]</p> <p>Defendant: All references are either R. 26 disclosures or search terms.</p>
J. DOE 186	235-13, 280-1, 321-1	Alleged Victim Affiliate	<p>Plaintiff: This material should be unsealed in full. Plaintiff sent a non-party notice to this individual and received delivery confirmation. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytle</i>, 810 F. Supp. 2d at 621. Further, this individual actually requested excerpts of materials mentioning them, which the parties sent them, and still raised no objection to unsealing after receiving those excerpts. Second, the sealed material as to this individual is not salacious and consists primarily of Rule 26 disclosures and lists of search terms.</p> <p>Defendant: All references are either R. 26 disclosures or search terms.</p>
J. DOE 187	249-13, 280-1, 321-1, 321-5, 321-6, 407-9, 423-4	Employee of Epstein; Alleged Witness	<p>Plaintiff: This material should be unsealed in full. Plaintiff sent a non-party notice to this individual, received delivery confirmation, and this individual request excerpts. First, this individual did not raise any objection to unsealing, and thus did not meet their burden of identifying interests that outweigh the presumption of access with specificity. <i>DiRussa</i>, 121 F.3d at 826; <i>Lytle</i>, 810 F. Supp. 2d at 621. Further, this individual actually requested excerpts of materials mentioning them, which the parties sent them, and still raised no objection to</p>

Giuffre v. Maxwell, 15-cv-7433-LAP
Original Parties' Joint Chart of Non-Objecting Does (February 7, 2023)

Pseudonym	Relevant Docket Entries	Characterization	Additional Comments/Argument
			<p>unsealing after receiving those excerpts. Second, the sealed material as to this individual is not salacious and consists primarily of Rule 26 disclosures and lists of search terms.</p> <p>Defendant: All references are R. 26 disclosures, search terms, or one deponent's refusal to answer whether the Doe is known to them, and refusing to answer all questions.</p>