



September 23, 2021

VIA ECF

Honorable Loretta A. Preska
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Giuffre v. Dershowitz*, Case No.: 19-cv-03377-LAP

Dear Judge Preska:

We write in our capacity as counsel to Plaintiff Virginia Giuffre in *Giuffre v. Prince Andrew, Duke of York*, 1:21-cv-06702-LAK, pending before Judge Lewis Kaplan. Subsequent to our correspondence with Your Honor dated September 13, 2021 (ECF No. 340), and the court's order of September 16, 2021 (ECF No. 343), Prince Andrew's counsel have accepted service in the case pending before Judge Kaplan and have requested in that case a copy of the release that was the subject of Mr. Dershowitz's September 8, 2021, letter to the Court (ECF No. 335).

Although we believe that the release is irrelevant to the case against Prince Andrew, now that service has been accepted and the case is proceeding to a determination on the merits, we believe that counsel for Prince Andrew have a right to review the release and to make whatever arguments they believe appropriate based on it. Accordingly, we have given Mr. Epstein's Estate notice of Prince Andrew's request and have asked the Estate to consent to our providing a copy of the release to Prince Andrew's counsel. We request permission from the Court pursuant to this Court's Protective Order to furnish a copy of the release to Prince Andrew's counsel once we have obtained consent from Mr. Epstein's Estate.

I apologize for the number of letters on this subject with which the Court has been burdened.

Respectfully yours,

A handwritten signature in blue ink that reads 'David Boies'.

David Boies

cc: Counsel of Record (via ECF)