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MEMO ENDORSED

September 5, 2025

BY ECF:

Hon. Richard M. Berman
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.,
Courtroom 17B
New York, NY 10007

RE: *United States of America v. Jeffrey Epstein*, Case No. 19-CR-490 (RMB)

Dear Judge Berman:

Pursuant to the August 26, 2025 Order of this Court, undersigned counsel for Epstein victims submits this response objecting to the unsealing requested by NBC. Consistent with the reasoning of this Court in its August 20, 2025 Order, particularly the discussion at pages 8-9, it is imperative that these names remain sealed, as disclosure poses a real threat to victims' safety and privacy and would be in violation of 18 U.S.C. § 3771, the Crime Victim's Rights Act's guarantees of fairness, privacy, conferral, and protection.

The letter submitted to the Court by NBC indicates that the network does not intend to reveal sensitive information about victims, and as such, it would be the hope of the undersigned that the request is mooted by nature of this correspondence. Our position has likewise been expressed to the Department of Justice.

Respectfully Submitted,
EDWARDS HENDERSON, PLLC

By:

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