

**United States District Court
Southern District of New York**

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

**MOTION FOR EXTENSION OF TIME TO RESPOND
TO 24-PAGE MOTION ON ATTORNEY-CLIENT WAIVER ISSUES**

Plaintiff Virginia L. Giuffre, by and through her undersigned counsel, hereby files this Motion for Extension of Time, and hereby states as follows:

On the evening of Thursday, May 26, 2016, Defendant filed a “Motion to Compel All Attorney-Client Communications and Attorney Work Product Placed at Issue by Plaintiff and Her Attorneys.” The motion was 24 pages long and raises a host of issues regarding alleged waivers of attorney-client communications and work-product protections in those areas. One of Ms. Giuffre’s counsel (Mr. Cassell) will be drafting the response to the motion, because most of the factual allegations in the motion relate to his actions as an attorney. Mr. Cassell has long-standing travel plans over the Memorial Day weekend, which will take him away from his office from Saturday, May 28, 2016, to Tuesday, May 31, 2016. On Wednesday, June 1, 2016, Mr. Cassell will fly from Utah to this Court for oral argument on several motions in this case. On Thursday, June 2, 2016, Mr. Cassell will argue those motions and then fly home to his office in Utah. Under the local rules, it appears that the response to the motion is due the next day,

Friday, June 3, 2016. In addition, the Court has currently set the matter for oral argument on Thursday, June 2, presumably requiring Ms. Giuffre's response by Wednesday, June 1.

In light of the foregoing circumstances, it will be exceedingly difficult for counsel to prepare the kind of substantive response that fully articulates Ms. Giuffre's position on this lengthy motion by June 1. At this point, with the hearing scheduled for Thursday, June 2, 2016, Ms. Giuffre's counsel will have only three business days in which to draft a response to the motion.

Counsel for Defendant has not consented to Ms. Giuffre's request to extend the time for filing.

For all these reasons, Ms. Giuffre seeks a short extension of time in which to respond to the 24-page Motion to Compel Attorney-Client Communications, from the current due date of Friday, June 3, until Wednesday, June 8, 2016. This is the first time Ms. Giuffre has requested any extension of time in this case. If the Court grants the motion for extension of time on the response, the motion could then be heard at the court's convenience, as early as Thursday, June 9, 2016, rather than Thursday, June 2, as currently scheduled.

Dated: May 27, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 27th day of May, 2016, I served the attached document
via Email to the following counsel of record.

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/s/ Sigrid S. McCawley

¹ This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah for this private representation.

Sigrid S. McCawley