

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT NEW YORK

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VIRGINIA GIUFFRE,

Plaintiff,

- against -

GHISLAINE MAXWELL,

Defendant.
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Index No. 15 Civ. 7433 (RWS)

ECF CASE

ORAL ARGUMENT REQUESTED

NOTICE OF MOTION TO QUASH SUBPOENA

PLEASE TAKE NOTICE that upon the accompanying declarations of Sharon Churcher and Laura R. Handman, sworn to June 15, 2016, and the exhibits annexed thereto, the accompanying Memorandum of Law, and all prior pleadings and proceedings heretofore had herein, the undersigned will move this Court, before the Honorable Robert W. Sweet, United States District Judge, Southern District of New York, for an order pursuant to Rule 45(d)(3) of the Federal Rules of Civil Procedure quashing the subpoena served by defendant Ghislaine Maxwell on non-party Sharon Churcher, and for such other and further relief as the Court shall deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to S.D.N.Y. Local Civil Rule 6.1 and Rule 6(d) of the Federal Rules of Civil Procedure, opposing papers, if any, must be served upon the undersigned on or before June 27, 2016; and reply papers, if any, must be served on or before July 1, 2016; with argument to be heard on July 7, 2016 (the first Thursday following the completion of briefing) or a later date convenient for the Court.

Dated: New York, New York
June 15, 2016

Respectfully submitted,

DAVIS WRIGHT TREMAINE LLP

By: /s/ Eric J. Feder

Laura R. Handman
Eric J. Feder
1251 Avenue of the Americas, 21st Floor
New York, New York 10020
Tel: (212) 489-8230
Fax: (212) 489-8340
laurahandman@dwt.com
ericfeder@dwt.com

Attorneys for Non-Party Sharon Churcher

TO: Laura Menninger
HADDON MORGAN & FOREMAN, PC
150 E. 10th Ave.
Denver, CO 80203
303-831-7364
Email: lmenninger@hmflaw.com

Attorneys for Defendant Ghislaine Maxwell

Sigrid S. McCawley
BOIES, SCHILLER & FLEXNER LLP
401 East Las Olas Boulevard, Suite 1200
Fort Lauderdale, FL 33301
954-356-0011
Email: smccawley@bsflp.com

Attorneys for Plaintiff Virginia Giuffre