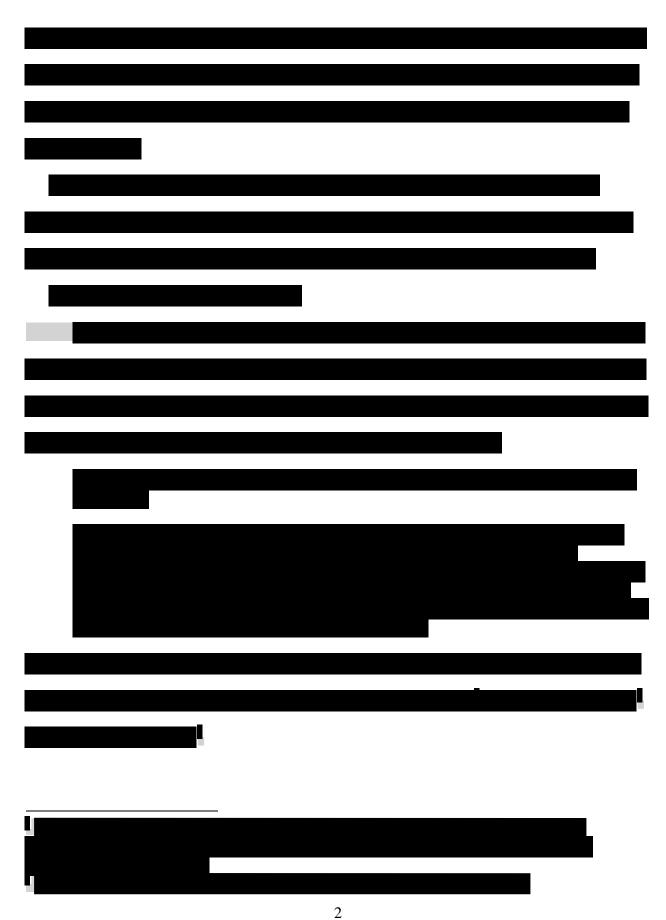
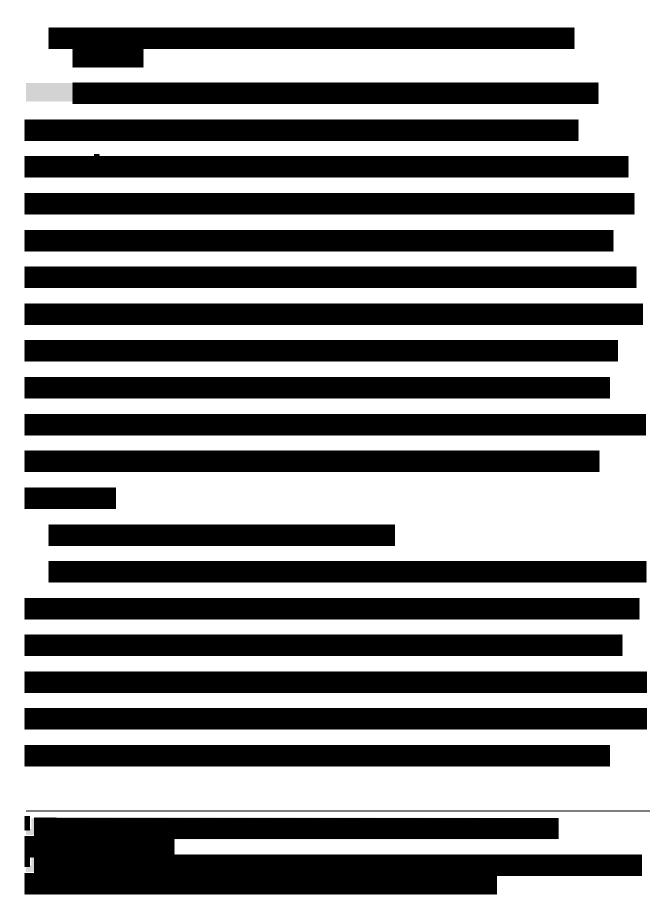
## **United States District Court Southern District of New York**

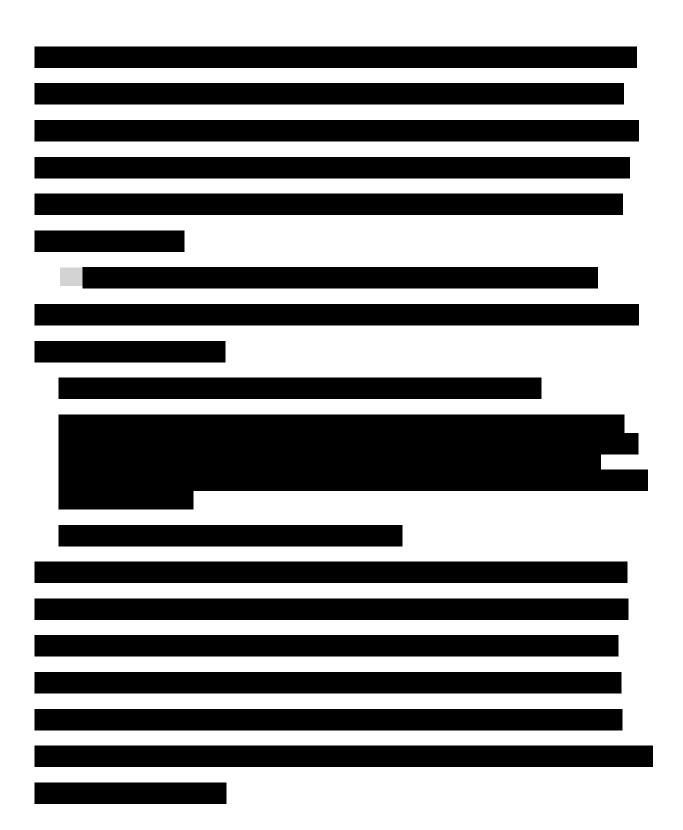
Virginia L. Giuffre,	
Plaintiff,	Case No.: 15-cv-07433-RWS
v.	
Ghislaine Maxwell,	
Defendant.	/
	FFRE'S SUR-REPLY IN RESPONSE TO DEFENDANT'S UPPORT OF MOTION FOR SANCTIONS
Plaintiff, Virginia Giuffre	e, hereby submits this sur-reply in response to Defendant's
Reply in Support of Motion for S	Sanctions, responding to Defendant's new – and inaccurate –
representation of facts.	
I. CORRECTIONS TO	O DEFENDANT'S FACTUAL MISREPRESENTATIONS
Ms. Giuffre does not make no	ew arguments in this brief, but, instead, rebuts some of the most
significant factual inaccuracies th	nroughout Defendant's reply brief.

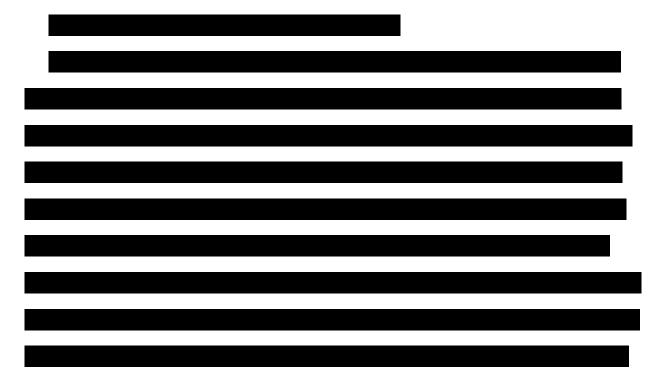






Curiously, in the "Argument" section of her reply brief, Defendant also raises a host	
additional – and new – factual claims about allegedly withheld records. Reply Br. at 9. Here	
again, Defendants' claims are inaccurate.	





There are multiple other inaccuracies throughout Defendant's brief, but in the interest of brevity and addressing only the most material inaccuracies, Ms. Giuffre has not addressed each one.

## **CONCLUSION**

Ms. Giuffre has properly disclosed her medical care providers to Defendant and, accordingly, Defendant's motion for sanction should be denied.

Dated: July 12, 2016.

Respectfully Submitted, BOIES, SCHILLER & FLEXNER LLP

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<sup>&</sup>lt;sup>5</sup> 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.

## **CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on the 12th day of July, 2016, I served the attached document via Email and CM/ECF to the following counsel of record.

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