United States District Court Southern District of New York

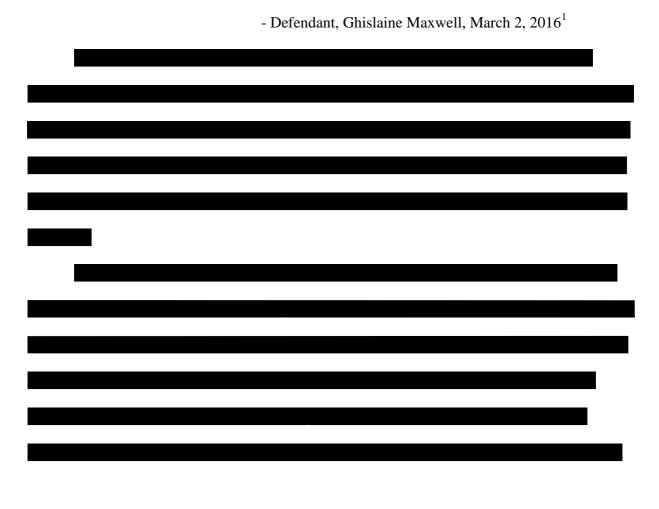
Virginia L. C	fuffre,	
	Plaintiff,	Case No.: 15-cv-07433-RWS
v.		
Ghislaine Ma	axwell,	
	Defendant.	

REPLY IN SUPPORT OF PLAINTIFF'S MOTION FOR PROTECTIVE ORDER AND TO DIRECT THE DEFENDANT TO DISCLOSE ALL INDIVIDUALS TO WHOM DEFENDANT HAS DISSIMINATED CONFIDENTIAL INFORMATION (DE 335)

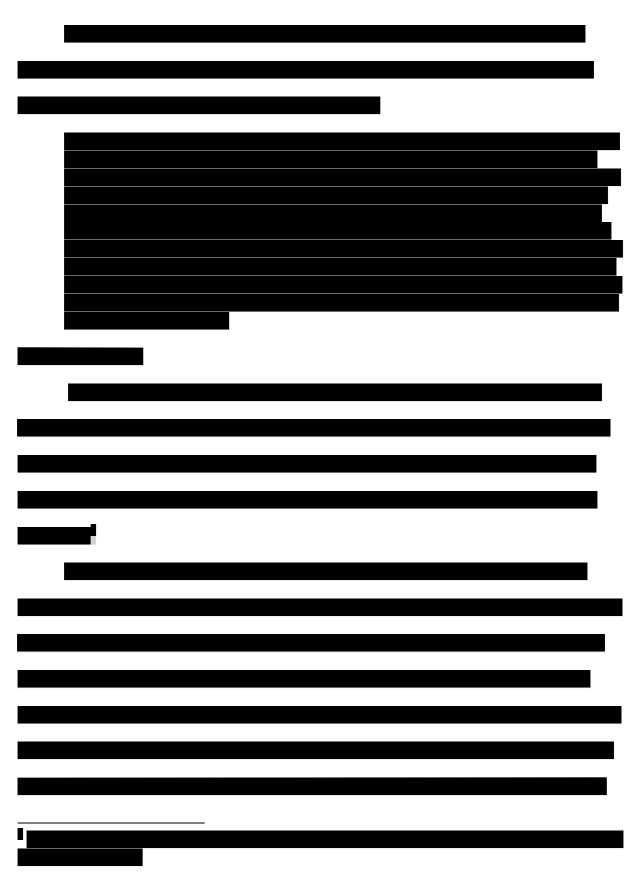
Sigrid McCawley (Pro Hac Vice) Meredith Schultz (Pro Hac Vice) BOIES, SCHILLER & FLEXNER LLP 401 E. Las Olas Blvd., Suite 1200 Ft. Lauderdale, FL 33301 (954) 356-0011 Plaintiff Virginia Giuffre, by and through her undersigned counsel, hereby files this Reply in Support of her Motion for Protective Order and Motion for the Court to Direct Defendant to Disclose All Individuals to whom Defendant has Disseminated Confidential Information (DE 335).

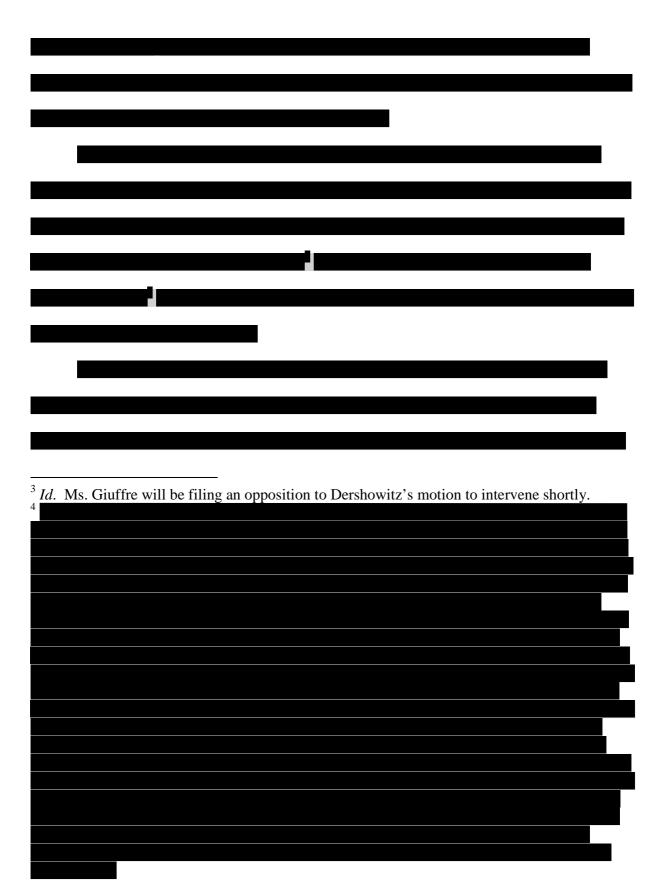
I. INTRODUCTION

"The nature of this case concerns highly personal and sensitive information from both parties. In this action, both parties have sought and will seek confidential information in the course of discovery from the other party and from non-party witnesses. Release of such confidential information outside of the litigation could expose the parties to 'annoyance, embarrassment, [and] oppression and result in significant injury to one or more of the parties' business or privacy interests."



¹ DE 38 at 1.







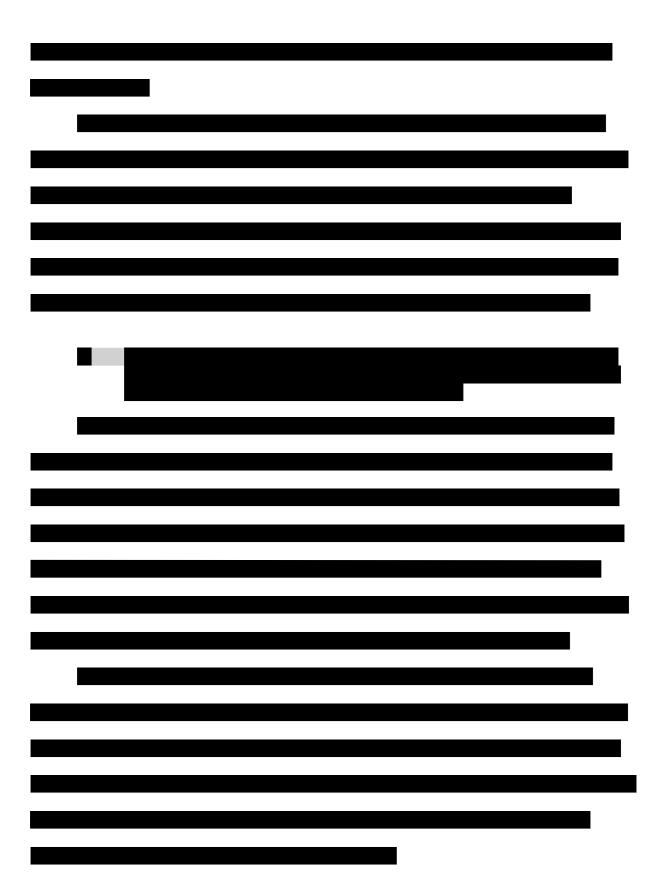
⁵ *Id*. ⁶ *Id*.

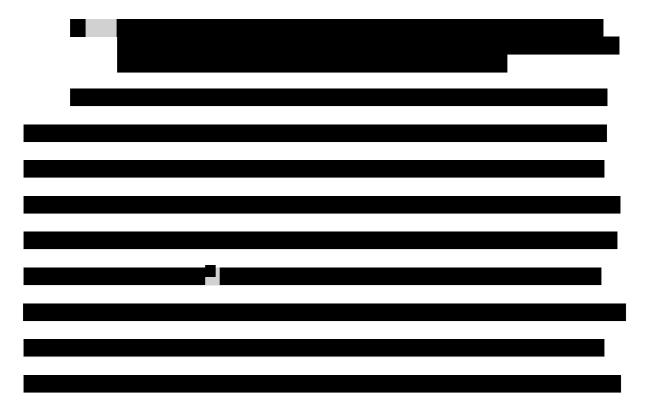
⁷ *Id*.

⁸ *Id.*9 *See* McCawley Dec. at Exhibit 3,



II.	DISCUSSION
	Given the extremity of the position she is staking out, it is unsurprising that Defendant's
antira	brief cites no case law, and presents no argument to refute Ms. Giuffre's case law.
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III. CONCLUSION

Ms. Giuffre was a child victim of sexual abuse, which is undisputed. Upon Defendant's own motion, this Court entered a Protective Order in this matter. Ms. Giuffre has shown good cause for confidentiality of the materials at issue. Therefore, the Court should hold that these materials are confidential. This Court should also direct Defendant to disclose all the individuals to whom she has already disseminated the material at issue, and direct the Defendant to recall such material forthwith.

DATED: August 23, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: <u>/s/ Meredith Schultz</u> Sigrid McCawley (Pro Hac Vice)

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¹⁶ 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 August 23, 2016, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I also certify that the foregoing document is being served to all parties of record via transmission of the Electronic Court Filing System generated by CM/ECF.

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/s/ Meredith Schultz
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