

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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VIRGINIA L. GIUFFRE,
Plaintiff,
v.
GHISLAINE MAXWELL,
Defendant.
-----X

15-cv-07433-RWS

UNOPPOSED MOTION FOR EXTENSION REGARDING EXPERT REPORTS

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Defendant, by and through the undersigned attorney, hereby requests that the Court enter an order further modifying its Order filed August 1, 2016 (Doc. #317), for the following reasons:

The parties filed a proposed scheduling order on July 25, 2016 in preparation for a December 12, 2016 trial date. Pursuant to that proposal, the parties previously agreed upon Expert Disclosures per 26(a)(2)(A) and (B) being made by August 31, 2016. On August 31, the Plaintiff filed an Unopposed Motion to extend the deadline to file expert reports from August 31, 2016 to September 8, 2016 (Doc. #413). This Motion was granted by the Court on September 6, 2016 (Doc. #420). On September 7, 2016, Plaintiff produced additional documents in this matter. Accordingly, the parties have now agreed to extend the initial expert disclosure deadline to September 15, 2016.

WHEREFORE, the parties request that the Court adopt the proposed schedule and modify the Court's Order of August 1, 2016, further modified on September 6, 2016, to reflect the above deadline modification.

Dated: September 8, 2016

Respectfully submitted,

/s/ Laura A. Menninger

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CERTIFICATE OF SERVICE

I certify that on September 8, 2016, I electronically served this *Unopposed Motion For Extension Regarding Expert Reports* via ECF on the following:

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