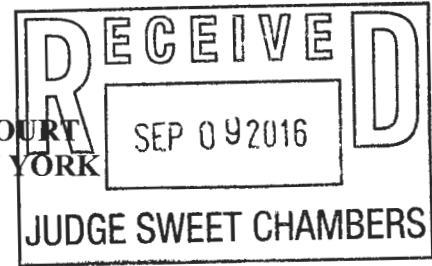


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



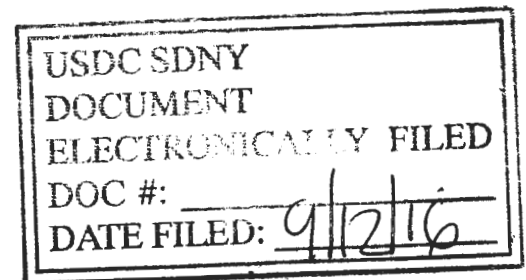
-----X
VIRGINIA L. GIUFFRE,

Plaintiff,
v.
GHISLAINE MAXWELL,

Defendant.
-----X

15-cv-07433-RWS

UNOPPOSED MOTION FOR EXTENSION REGARDING EXPERT REPORTS



*So ordered
Sweet USDC
9.12.16*

Laura A. Menninger
Jeffrey S. Pagliuca
HADDON, MORGAN, AND FOREMAN, P.C.
150 East 10th Avenue
Denver, CO 80203
303.831.7364

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

Laura A. Menninger (LM-1374)

Jeffrey S. Pagliuca (*pro hac vice*)

HADDON, MORGAN AND FOREMAN, P.C.

150 East 10th Avenue

Denver, CO 80203

Phone: 303.831.7364

Fax: 303.832.2628

lmenninger@hmflaw.com

Attorneys for Ghislaine Maxwell

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:

Sigrid S. McCawley
Meredith Schultz
BOIES, SCHILLER & FLEXNER, LLP
401 East Las Olas Boulevard, Ste. 1200
Ft. Lauderdale, FL 33301
smccawley@bsfllp.com
mschultz@bsfllp.com

Bradley J. Edwards
FARMER, JAFFE, WEISSING, EDWARDS,
FISTOS & LEHRMAN, P.L.
425 North Andrews Ave., Ste. 2
Ft. Lauderdale, FL 33301
brad@pathtojustice.com

Paul G. Cassell
383 S. University Street
Salt Lake City, UT 84112
cassellp@law.utah.edu

J. Stanley Pottinger
49 Twin Lakes Rd.
South Salem, NY 10590
StanPottinger@aol.com

/s/ Nicole Simmons
Nicole Simmons