UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

	X	
VIRGINIA L. GIUFFRE,		
Plaintiff, v.		15-cv-07433-RWS
GHISLAINE MAXWELL,		
Defendant.		
	X	

Declaration Of Jeffrey S. Pagliuca In Support Of Defendant's Motion to Compel Testimony of Jeffrey Epstein

- I, Jeffrey S. Pagliuca, declare as follows:
- 1. I am an attorney at law duly licensed in the State of Colorado and admitted to practice in the United States District Court for the Southern District of New York *pro hac vice*. I am a member of the law firm Haddon, Morgan & Foreman, P.C., counsel of record for Defendant Ghislaine Maxwell ("Maxwell") in this action. I respectfully submit this declaration in support of the Motion to Compel Testimony of Jeffrey Epstein.
 - 2. Attached as Exhibit A (filed under seal) is a true and correct copy of the

5	5.	Attached as Exhibit D is a true and correct copy of an email dated September 24,		
2007 from A.U.S.A Ann Marie Villafana.				
6	5.	Attached as Exhibit E (filed under seal) is a true and correct copy of the		
		, Bates stamped		
GIUFFRE007597-007605.				
7	7.	Attached as Exhibit F (filed under seal) are true and correct copies of excerpts		
Dated: S	Septen	nber 30, 2016		
		By: /s/ Jeffrey S. Pagliuca		
		Jeffrey S. Pagliuca		

CERTIFICATE OF SERVICE

I certify that on September 30, 2016, I electronically served this *Declaration Of Jeffrey S. Pagliuca In Support Of Defendant's Motion to Compel Testimony of Jeffrey Epstein* via ECF on the following:

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/s/ Nicole Simmons

Nicole Simmons