

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

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

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**PLAINTIFF'S RESPONSE TO DEFENDANT'S MOTION TO COMPEL  
TESTIMONY OF JEFFREY EPSTEIN**

Sigrid McCawley  
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**I. Introduction**

Plaintiff Ms. Virginia Giuffre respectfully submits this response to Maxwell's Motion to Compel Testimony of Jeffrey Epstein in order to alert the Court to the fact

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] It is Ms. Giuffre's

position that if Jeffrey Epstein is compelled to testify about Defendant, the testimony

will incriminate Defendant. [REDACTED]

[REDACTED]

[REDACTED]

**II. Background**

As the Court is aware from Maxwell's motion, on September 9, 2016, Epstein appeared pursuant to the subpoena and was deposed in the Southern District of Florida. After Epstein was sworn in, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

III. Plaintiff's Future Request upon the Court Regarding the Hearing on the Instant Motion and Request Regarding Sealing of the Records

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

IV. CONCLUSION

[REDACTED]

[REDACTED]

[REDACTED]

Dated: October 17, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

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<sup>3</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 October 17, 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 this day on the individuals identified below via transmission of Notices of Electronic Filing generated by CM/ECF.

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