

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

**Declaration Of Jeffrey S. Pagliuca In Support Of Defendant's
Motion in Limine to Exclude Expert Testimony and Opinion of Chris Anderson**

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 in Limine to Exclude Expert Testimony and Opinion of Chris Anderson.

2. Attached as Exhibit A (filed under seal) is a true and correct copy of [REDACTED]

[REDACTED]

3. Attached as Exhibit B (filed under seal) are true and correct copies [REDACTED]

[REDACTED]

[REDACTED]

4. Attached as Exhibit C (filed under seal) is a true and correct copy of [REDACTED]
[REDACTED]
[REDACTED]
5. Attached as Exhibit D (filed under seal) is a true and correct copy of [REDACTED]
[REDACTED]
[REDACTED]
6. Attached as Exhibit E (filed under seal) is a true and correct copy of [REDACTED]
[REDACTED]
[REDACTED]
7. Attached as Exhibit F (filed under seal) are true and correct copies [REDACTED]
[REDACTED]
[REDACTED]
8. Attached as Exhibit G (filed under seal) is a true and correct copy of [REDACTED]
[REDACTED]
9. Attached as Exhibit H (filed under seal) is a true and correct copy of a Jewish Business News article titled: Lawyers for British Socialite Accused of Pimping 'Sex Slave' To Jeffrey Epstein Push to Dismiss Defamation Lawsuit, dated January 15, 2016.
10. Attached as Exhibit I (filed under seal) is a true and correct copy of a Justice Integrity Project article titled: Moralism Kenn Starr Explains His Help For Billionaire Pervert Jeffrey Epstein, dated February 8, 2015.
11. Attached as Exhibit J (filed under seal) is a true and correct copy of a Daily Mail article titled: Silence of the Epstein women: Former top model among several

female employees of billionaire who refuse to answer questions on Prince Andrew
'sex slave' allegations, dated January 4, 2015.

12. Attached as Exhibit K (filed under seal) is a true and correct copy of a Local 10
article titled: Alan Dershowitz: 'Sex slave' accuser is serial liar, prostitute, dated
January 22, 2015.

Dated: January 5, 2017

By: /s/ Jeffrey S. Pagliuca
Jeffrey S. Pagliuca

CERTIFICATE OF SERVICE

I certify that on January 5, 2017, I electronically served this *Declaration Of Jeffrey S. Pagliuca In Support Of Defendant's Motion in Limine to Exclude Expert Testimony and Opinion Chris Anderson* via ECF on the following:

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/s/ Nicole Simmons

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