

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
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 Professor Terry Coonan, J.D.**

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 Professor Terry Coonan, J.D.

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 of [REDACTED]

[REDACTED]

[REDACTED]

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 of Professor Terry Coonan, J.D.* 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@pathtojjustice.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