

**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 Dr. Bernard Jansen**

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 Dr. Bernard Jansen.

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 a BBC News article titled: Q&A: Prince Andrew claims, dated April 8, 2015.
5. Attached as Exhibit D (filed under seal) are true and correct copies [REDACTED]
[REDACTED]
[REDACTED]
6. Attached as Exhibit E (filed under seal) is a true and correct copy of a Reuters U.S. article titled: British socialite to face Epstein accuser's defamation lawsuit, dated March 1, 2016.
7. Attached as Exhibit F (filed under seal) are true and correct copies of a compilation of articles cited in [REDACTED]
[REDACTED].
8. Attached as Exhibit G (filed under seal) is a true and correct copy of [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 Dr. Bernard Jansen* via ECF on the following:

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/s/ Nicole Simmons

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