

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

Virginia L. Giuffre,

Plaintiff,

Case No: 15-cv-07433-RWS

v .

Ghislaine Maxwell,

Defendant.

**PLAINTIFF'S OBJECTIONS TO DEFENDANT'S DEPOSITION DESIGNATIONS
AND PLAINTIFF'S CROSS DESIGNATIONS**

Plaintiff Virginia Giuffre, hereby submits the following objections to Defendant's Deposition Designations and submits the following cross designations. Contemporaneously with the submission of these objections, Plaintiff is filing two Motions in Limine to exclude Defendant's attempt to use prior deposition testimony from other matters at the March 13, 2017 trial in this case. Specifically, Plaintiff is filing Plaintiff's Motion to Exclude Defendant's Designations of Deposition Excerpts of Alan Dershowitz in an Unrelated Case and Plaintiff's Motion to Exclude Defendant's Designations of Deposition Excerpts of Virginia Giuffre in an Unrelated Case. Because these motions in limine deal with a vast amount of testimony, Ms. Giuffre reserves her right to supplement these objections and cross designations should the Court deny the motions in limine. Ms. Giuffre also reserves the right to supplement these objections based on objections that might be made by Defendant.

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(FILED UNDER SEAL)

**PLAINTIFF'S OBJECTIONS TO DEFENDANT'S DEPOSITION
DESIGNATION AND PLAINTIFF'S CROSS DESIGNATIONS**

Dated: January 27, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid S. McCawley

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 27th day of January, 2017, 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 all parties of record via transmission of the Electronic Court Filing System generated by CM/ECF.

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