

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

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

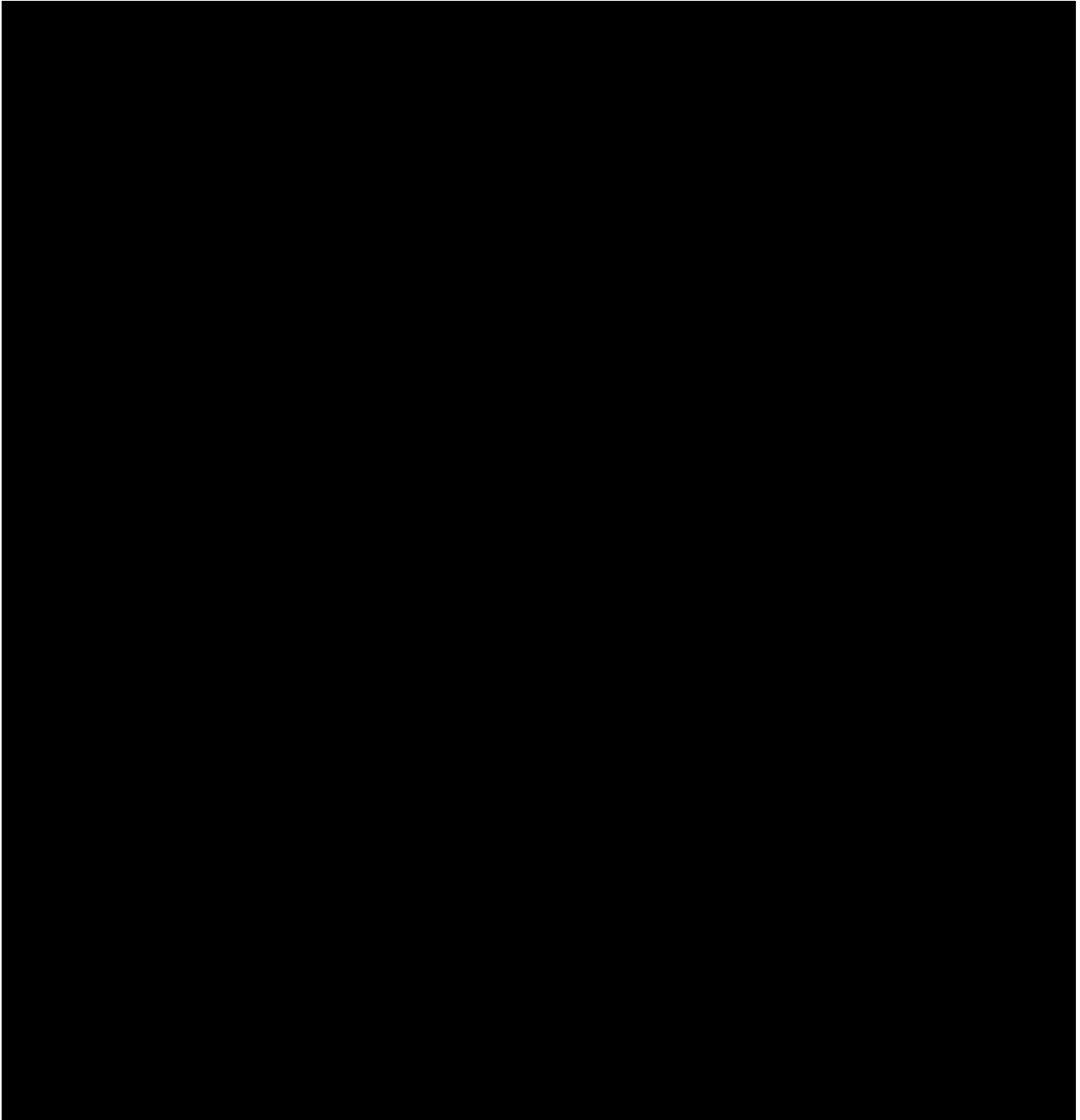
**PLAINTIFF’S NOTICE OF INTENT TO OFFER STATEMENTS UNDER, IF
NECESSARY, THE RESIDUAL HEARSAY RULE**

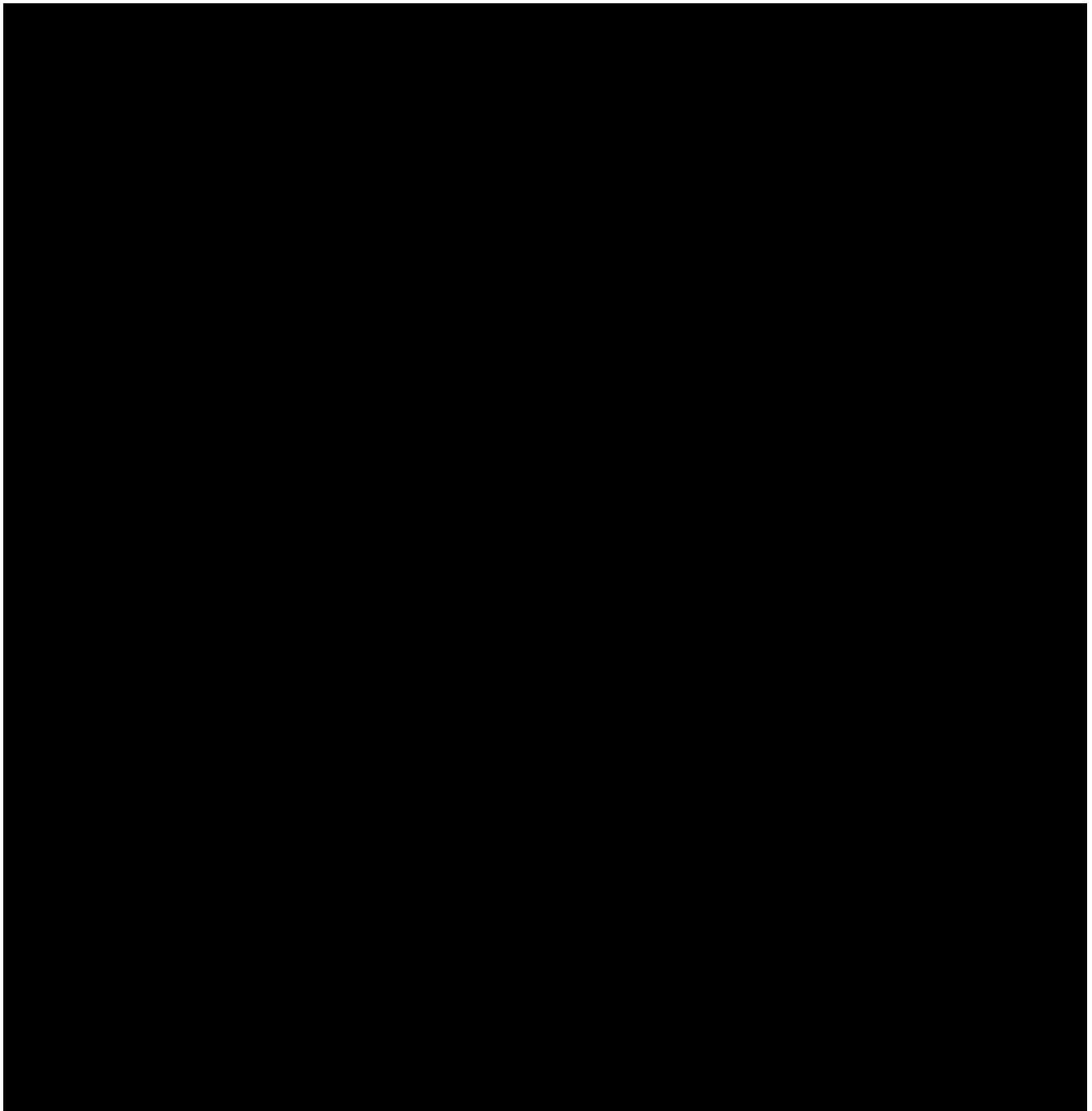
Plaintiff, Virginia Giuffre, by and through her undersigned counsel, hereby gives notice of her intent to offer statements under, if necessary, the residual hearsay rule provided in Fed. R. Evid. 807.

Defendant has indicated, through counsel, that she intends to raise every possible objection to Ms. Giuffre’s evidence in this case. Some of evidence Ms. Giuffre intends to offer may be regarded as hearsay evidence and Ms. Giuffre is fully prepared to defend the use of the evidence under the standard hearsay exceptions contained in Fed. R. Evid. 803 and 804. However, if the Court were to conclude that Ms. Giuffre’s evidence is hearsay not covered by these rules, Ms. Giuffre intends to rely on the residual hearsay rule contained in Fed. R. Evid. 807. That rule applies when hearsay “is not specifically covered by a hearsay exception in Rule 803 or 804.” Fed. R. Evid. 807(a).

Rule 807 contains a notice requirement, which allows a statement to be admitted under the residual hearsay rule “only if, before the trial or hearing, the proponent gives an adverse party

reasonable notice of the intent to offer the statement and its particulars, including the declarant's name and address, so that the party has a fair opportunity to meet it." This document will serve as to provide that advance notice to Defendant and the documents referenced have all been produced in the course of discovery. Specifically, Ms. Giuffre gives notice of the following statements:





February 9, 2017

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 9th day of February, 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 to all parties of record via transmission of the Electronic Court Filing System generated by CM/ECF.

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