

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 Reply  
In Support Of Her Motion In Limine to Exclude Expert Testimony  
and Opinion of Dr. Gilbert Kliman**

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 her Motion In Limine to Exclude Expert Testimony and Opinion of Dr. Gilbert Kliman.

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

[REDACTED]

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

[REDACTED]

Dated: February 10, 2017

By: /s/ Jeffrey S. Pagliuca

Jeffrey S. Pagliuca

**CERTIFICATE OF SERVICE**

I certify that on February 10, 2017, I electronically served this *Declaration Of Jeffrey S. Pagliuca In Support Of Defendant's Reply In Support Of Her Motion In Limine to Exclude Expert Testimony and Opinion of Dr. Gilbert Kliman* via ECF on the following:

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