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 Police Reports and Other Inadmissible Hearsay

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 Police Reports and Other Inadmissible Hearsay.

2. Attached as Exhibit A (filed under seal) are true and correct copies of records

from

3. Attached as Exhibit B (filed under seal) are true and correct copies of

4. Attached as Exhibit C (filed under seal) is a true and correct copy of

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 3, 2017

By: /s/ Jeffrey S. Pagliuca Jeffrey S. Pagliuca

CERTIFICATE OF SERVICE

I certify that on March 3, 2017, I electronically served this *Declaration Of Jeffrey S. Pagliuca In* Support Of Defendant's Motion In Limine to Exclude Police Reports and Other Inadmissible Hearsay via ECF on the following:

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/s/ Nicole Simmons

Nicole Simmons