United States District Court Southern District of New York

Virginia	L. Gluffre,	
	Plaintiff,	Case No.: 15-cv-07433-RWS
V.		
Ghislaine	e Maxwell,	
	Defendant.	

PLAINTIFF'S RESPONSE TO JEFFREY EPSTEIN'S MOTION TO QUASH TRIAL SUBPOENA

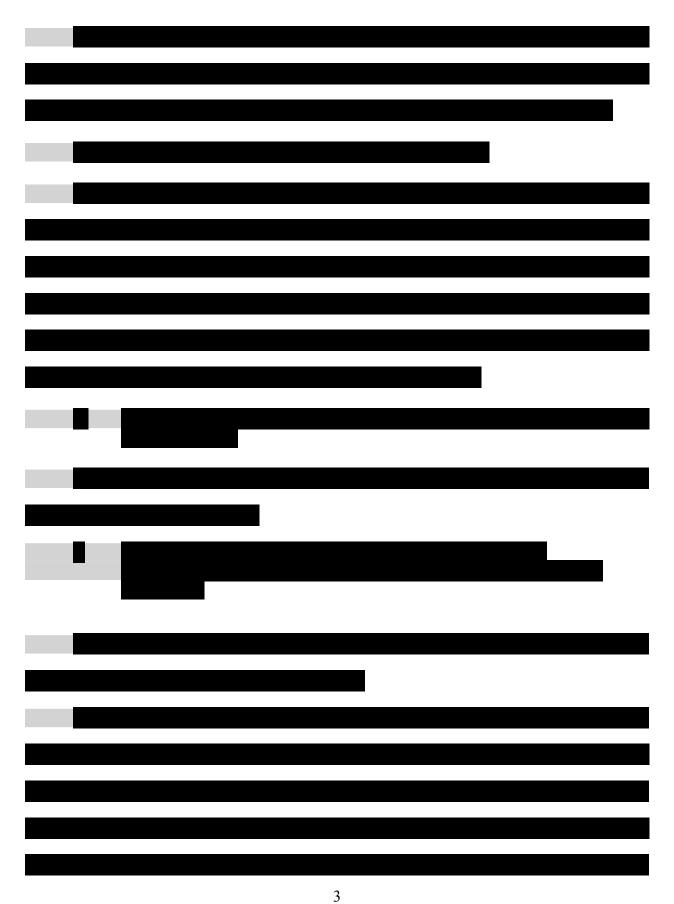
Plaintiff, Virginia Giuffre, by and through her undersigned counsel, hereby files this response to Jeffrey Epstein's Motion to Quash Trial Subpoena. No good reason having been provided why this important witness should not have to appear at trial, the motion to quash should be denied.

BACKGROUND

As the Court is aware from previous briefing, Jeffrey Epstein is an important witness in this case. *See, e.g.*, Plaintiff's Statement of Undisputed Facts in Response to Defendant's Motion for Summary Judgment at 4-27 (recounting details of Epstein's and Defendant's sex trafficking and sex abuse conspiracy); *see also* Plaintiff Giuffre's Reply in Support of Motion to Present Testimony from Jeffrey Epstein for Purposes of Obtaining and Adverse Inference (explaining numerous questions that Ms. Giuffre intends to ask Epstein as trial). Accordingly, Ms. Giuffre has served him with a trial subpoena, through Epstein's legal counsel. Epstein's, through counsel, now has filed a motion to quash to subpoena.

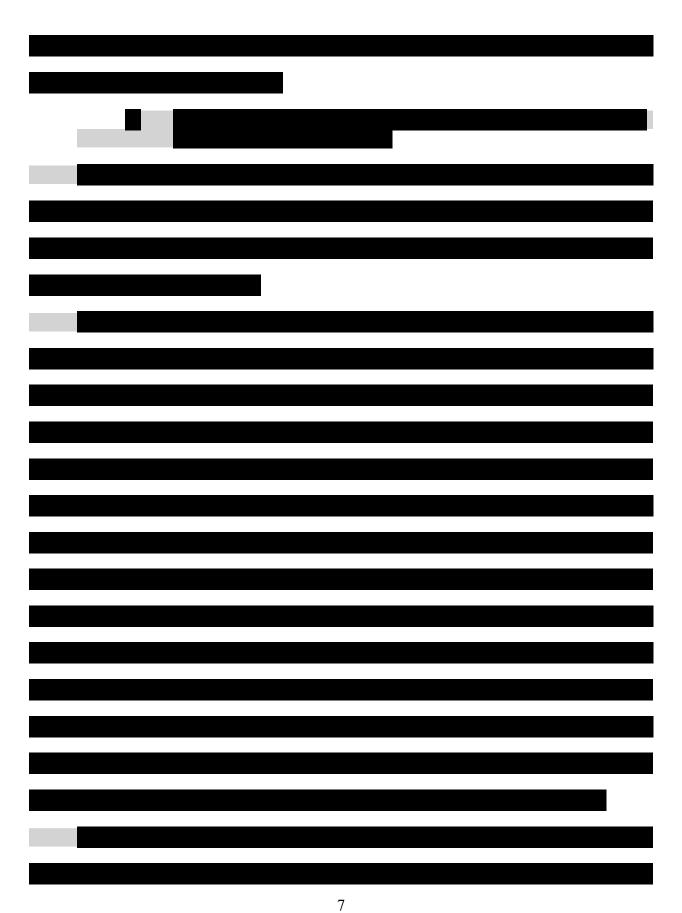
DISCUSSION

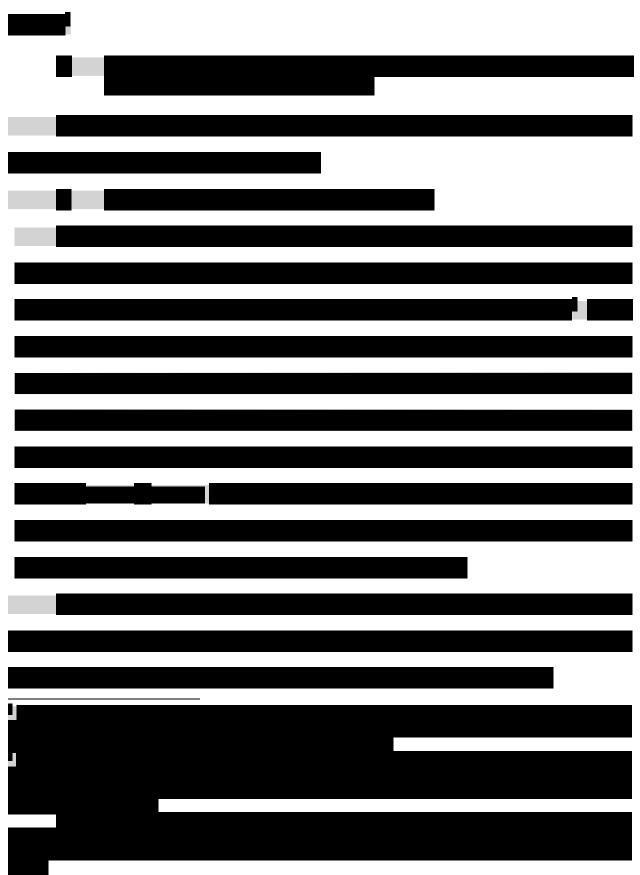
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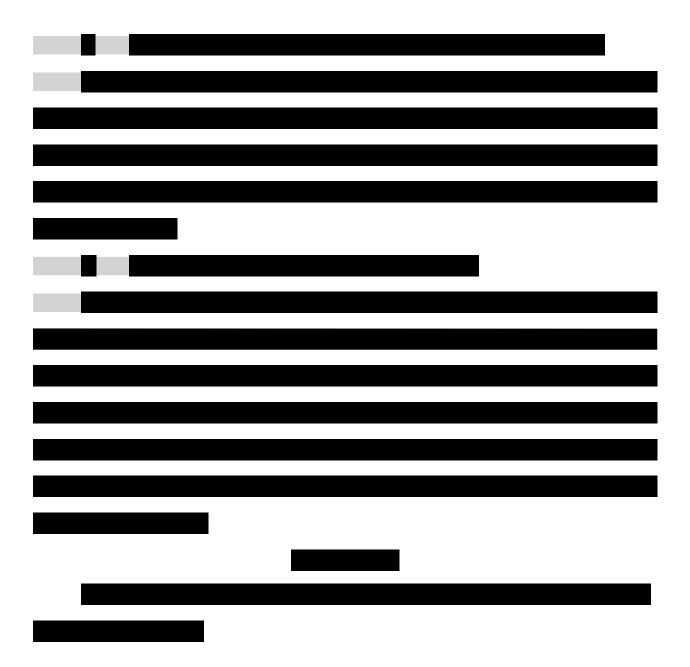












Dated: March 14, 2017

Respectfully Submitted,

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⁴ This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah for this private representation.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 14th day of March, 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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/s/ Sigrid McCawley
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