

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

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

**PLAINTIFF MS. GIUFFRE'S RESPONSE TO
DEFENDANT'S MOTION TO PROHIBIT QUESTIONING
REGARDING DEFENDANTS' ADULT CONSENSUAL ACTIVITIES**

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Plaintiff, Ms. Virginia Giuffre, respectfully submits this memorandum of law in response and opposition to Defendant's Motion to Prohibit Questioning Regarding Defendant's Adult Consensual Activities.

PRELIMINARY STATEMENT

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A horizontal bar chart consisting of 15 bars. The bars are arranged vertically. Most bars are solid black. There are four bars that have a light gray segment at the beginning, followed by a black segment. The lengths of the bars vary significantly, with some being very long and others being very short. The bars are roughly ordered from top to bottom: 1. Long black bar. 2. Long black bar. 3. Short black bar. 4. Bar with light gray segment and long black segment. 5. Long black bar. 6. Medium black bar. 7. Bar with light gray segment and long black segment. 8. Long black bar. 9. Long black bar. 10. Long black bar. 11. Long black bar. 12. Medium black bar. 13. Short black bar. 14. Bar with light gray segment and long black segment. 15. Long black bar.

the 1990s, the number of people in the United States who are 65 years of age and older has increased by 50 percent, and the number of people 75 years of age and older has increased by 100 percent. The number of people 85 years of age and older has increased by 200 percent. The number of people 90 years of age and older has increased by 400 percent. The number of people 95 years of age and older has increased by 800 percent. The number of people 100 years of age and older has increased by 1,600 percent. The number of people 105 years of age and older has increased by 3,200 percent. The number of people 110 years of age and older has increased by 6,400 percent. The number of people 115 years of age and older has increased by 12,800 percent. The number of people 120 years of age and older has increased by 25,600 percent. The number of people 125 years of age and older has increased by 51,200 percent. The number of people 130 years of age and older has increased by 102,400 percent. The number of people 135 years of age and older has increased by 204,800 percent. The number of people 140 years of age and older has increased by 409,600 percent. The number of people 145 years of age and older has increased by 819,200 percent. The number of people 150 years of age and older has increased by 1,638,400 percent. The number of people 155 years of age and older has increased by 3,276,800 percent. The number of people 160 years of age and older has increased by 6,553,600 percent. The number of people 165 years of age and older has increased by 13,107,200 percent. The number of people 170 years of age and older has increased by 26,214,400 percent. The number of people 175 years of age and older has increased by 52,428,800 percent. The number of people 180 years of age and older has increased by 104,857,600 percent. The number of people 185 years of age and older has increased by 209,715,200 percent. The number of people 190 years of age and older has increased by 419,430,400 percent. The number of people 195 years of age and older has increased by 838,860,800 percent. The number of people 200 years of age and older has increased by 1,677,721,600 percent. The number of people 205 years of age and older has increased by 3,355,443,200 percent. The number of people 210 years of age and older has increased by 6,710,886,400 percent. The number of people 215 years of age and older has increased by 13,421,772,800 percent. The number of people 220 years of age and older has increased by 26,843,545,600 percent. The number of people 225 years of age and older has increased by 53,687,091,200 percent. The number of people 230 years of age and older has increased by 107,374,182,400 percent. The number of people 235 years of age and older has increased by 214,748,364,800 percent. The number of people 240 years of age and older has increased by 429,496,729,600 percent. The number of people 245 years of age and older has increased by 858,993,459,200 percent. The number of people 250 years of age and older has increased by 1,717,986,918,400 percent. The number of people 255 years of age and older has increased by 3,435,973,836,800 percent. The number of people 260 years of age and older has increased by 6,871,947,673,600 percent. The number of people 265 years of age and older has increased by 13,743,895,347,200 percent. The number of people 270 years of age and older has increased by 27,487,790,694,400 percent. The number of people 275 years of age and older has increased by 54,975,581,388,800 percent. The number of people 280 years of age and older has increased by 109,951,162,777,600 percent. The number of people 285 years of age and older has increased by 219,902,325,555,200 percent. The number of people 290 years of age and older has increased by 439,804,651,110,400 percent. The number of people 295 years of age and older has increased by 879,609,302,220,800 percent. The number of people 300 years of age and older has increased by 1,759,218,604,441,600 percent. The number of people 305 years of age and older has increased by 3,518,437,208,883,200 percent. The number of people 310 years of age and older has increased by 7,036,874,417,766,400 percent. The number of people 315 years of age and older has increased by 14,073,748,835,532,800 percent. The number of people 320 years of age and older has increased by 28,147,497,671,065,600 percent. The number of people 325 years of age and older has increased by 56,294,995,342,131,200 percent. The number of people 330 years of age and older has increased by 112,589,990,684,262,400 percent. The number of people 335 years of age and older has increased by 225,179,981,368,524,800 percent. The number of people 340 years of age and older has increased by 450,359,962,737,049,600 percent. The number of people 345 years of age and older has increased by 900,719,925,474,099,200 percent. The number of people 350 years of age and older has increased by 1,801,439,850,948,198,400 percent. The number of people 355 years of age and older has increased by 3,602,879,701,896,396,800 percent. The number of people 360 years of age and older has increased by 7,205,759,403,792,793,600 percent. The number of people 365 years of age and older has increased by 14,411,518,807,585,587,200 percent. The number of people 370 years of age and older has increased by 28,823,037,615,171,174,400 percent. The number of people 375 years of age and older has increased by 57,646,075,230,342,348,800 percent. The number of people 380 years of age and older has increased by 115,292,150,460,684,697,600 percent. The number of people 385 years of age and older has increased by 230,584,300,921,369,395,200 percent. The number of people 390 years of age and older has increased by 461,168,601,842,738,790,400 percent. The number of people 395 years of age and older has increased by 922,337,203,685,477,580,800 percent. The number of people 400 years of age and older has increased by 1,844,674,407,370,955,161,600 percent. The number of people 405 years of age and older has increased by 3,689,348,814,741,910,323,200 percent. The number of people 410 years of age and older has increased by 7,378,697,629,483,820,646,400 percent. The number of people 415 years of age and older has increased by 14,757,395,258,967,641,292,800 percent. The number of people 420 years of age and older has increased by 29,514,790,517,935,282,585,600 percent. The number of people 425 years of age and older has increased by 59,029,581,035,870,565,171,200 percent. The number of people 430 years of age and older has increased by 118,059,162,071,741,130,342,400 percent. The number of people 435 years of age and older has increased by 236,118,324,143,482,260,684,800 percent. The number of people 440 years of age and older has increased by 472,236,648,286,964,521,369,600 percent. The number of people 445 years of age and older has increased by 944,473,296,573,929,042,739,200 percent. The number of people 450 years of age and older has increased by 1,888,946,593,147,858,085,478,400 percent. The number of people 455 years of age and older has increased by 3,777,893,186,295,716,170,956,800 percent. The number of people 460 years of age and older has increased by 7,555,786,372,591,432,341,913,600 percent. The number of people 465 years of age and older has increased by 15,111,572,745,182,864,683,827,200 percent. The number of people 470 years of age and older has increased by 30,223,145,490,365,729,367,654,400 percent. The number of people 475 years of age and older has increased by 60,446,290,980,731,458,735,308,800 percent. The number of people 480 years of age and older has increased by 120,892,581,961,462,917,470,617,600 percent. The number of people 485 years of age and older has increased by 241,785,163,922,925,834,941,235,200 percent. The number of people 490 years of age and older has increased by 483,570,327,845,851,669,882,470,400 percent. The number of people 495 years of age and older has increased by 967,140,655,691,703,339,764,940,800 percent. The number of people 500 years of age and older has increased by 1,934,281,311,383,406,679,529,881,600 percent. The number of people 505 years of age and older has increased by 3,868,562,622,766,813,359,059,763,200 percent. The number of people 510 years of age and older has increased by 7,737,125,245,533,626,718,119,526,400 percent. The number of people 515 years of age and older has increased by 15,474,250,491,067,253,436,239,052,800 percent. The number of people 520 years of age and older has increased by 30,948,500,982,134,506,872,478,105,600 percent. The number of people 525 years of age and older has increased by 61,897,001,964,269,013,744,956,211,200 percent. The number of people 530 years of age and older has increased by 123,794,003,928,538,027,489,912,422,400 percent. The number of people 535 years of age and older has increased by 247,588,007,857,076,054,979,824,844,800 percent. The number of people 540 years of age and older has increased by 495,176,015,714,152,109,959,649,689,600 percent. The number of people 545 years of age and older has increased by 990,352,031,428,304,219,919,299,379,200 percent. The number of people 550 years of age and older has increased by 1,980,704,062,856,608,439,838,598,758,400 percent. The number of people 555 years of age and older has increased by 3,961,408,125,713,216,879,677,197,516,800 percent. The number of people 560 years of age and older has increased by 7,922,816,251,426,433,759,354,395,033,600 percent. The number of people 565 years of age and older has increased by 15,845,632,502,852,867,518,708,790,067,200 percent. The number of people 570 years

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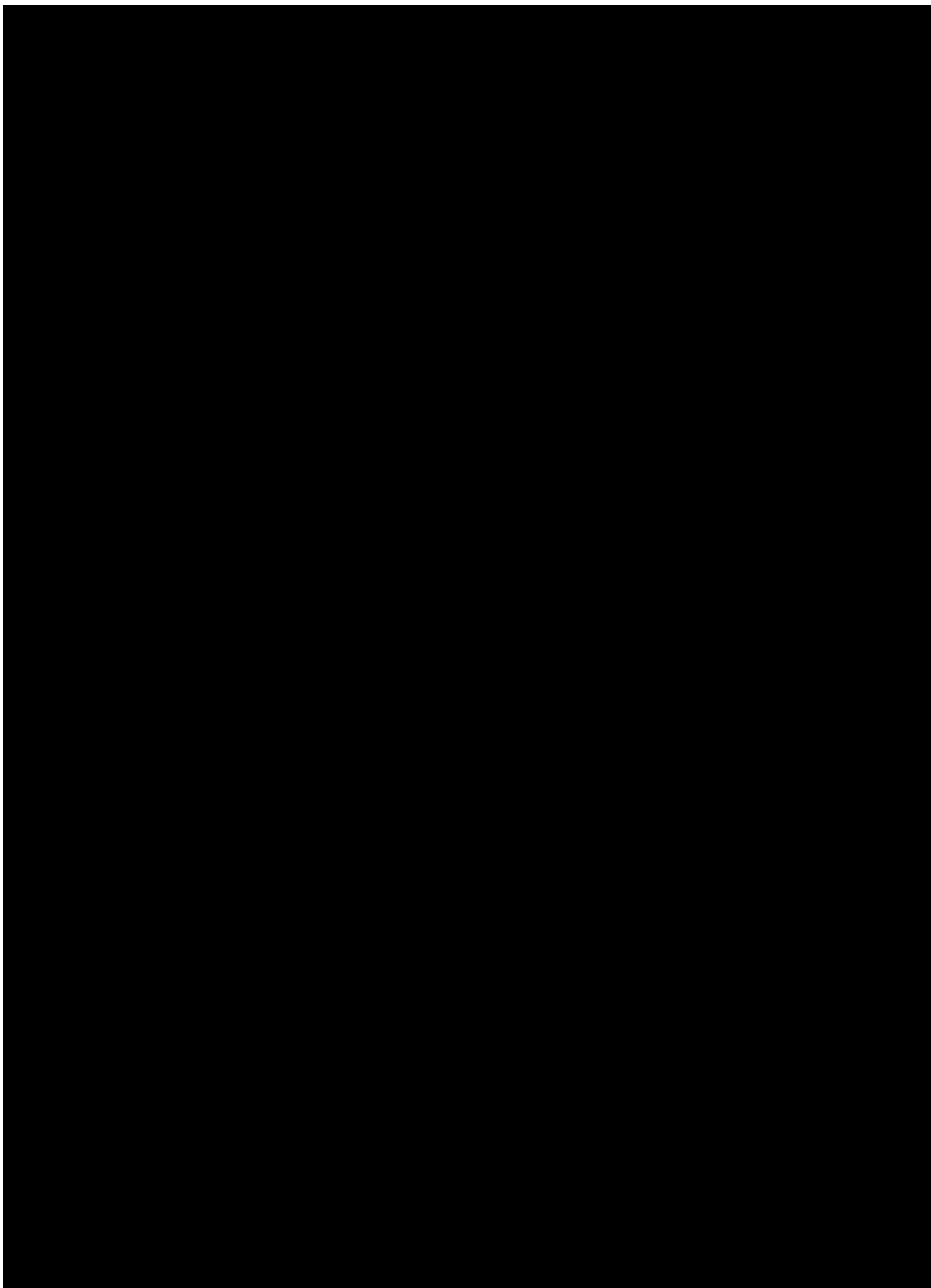
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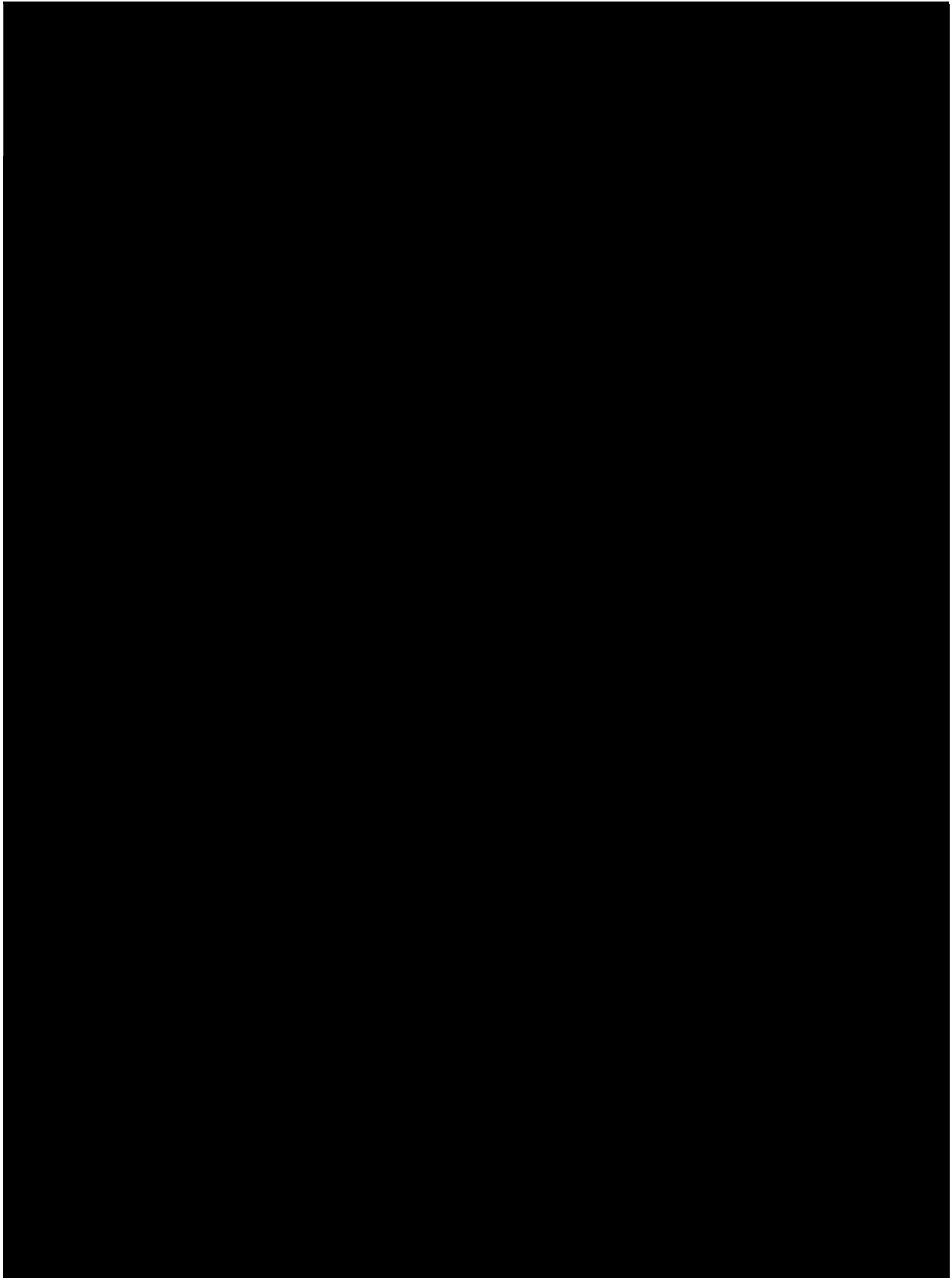
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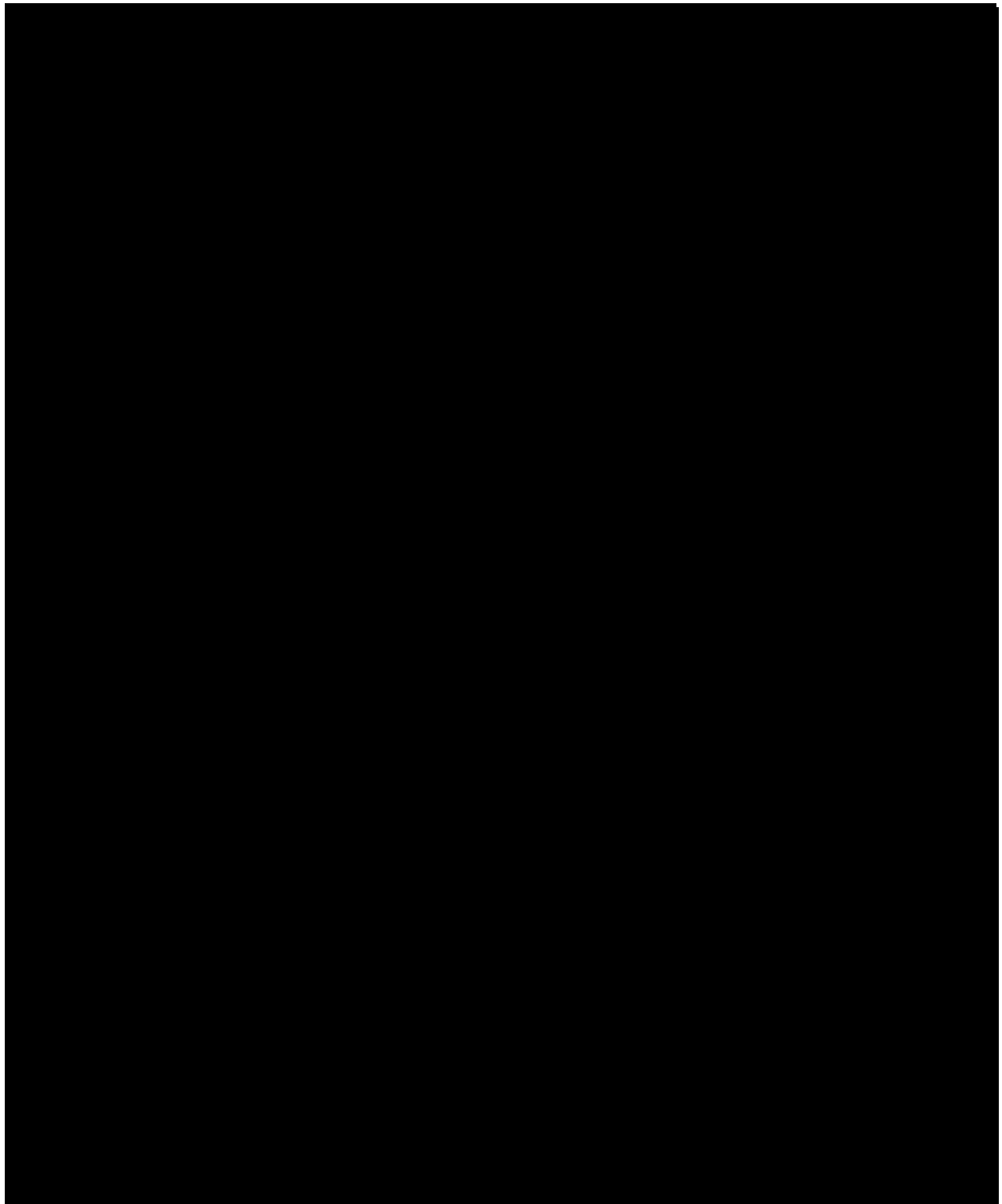
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A horizontal bar chart consisting of 20 bars. The bars are arranged vertically. Most bars are solid black. The 4th bar from the top has a light gray segment at the beginning, followed by a black segment. The 7th bar has a very small light gray segment at the beginning, followed by a black segment. The 10th bar has a light gray segment at the beginning, followed by a black segment. The 13th bar has a light gray segment at the beginning, followed by a black segment. The 16th bar has a light gray segment at the beginning, followed by a black segment. The 19th bar has a light gray segment at the beginning, followed by a black segment. The 20th bar has a light gray segment at the beginning, followed by a black segment. The bars vary in length, with the 1st bar being the longest and the 10th bar being the shortest.

Bar Index	Bar Color	Approximate Length (%)
1	Black	100
2	Black	85
3	Grey	10
4	Black	95
5	Black	98
6	Black	99
7	Black	99
8	Black	100
9	Black	100
10	Black	100
11	Black	45
12	Grey	100
13	Black	100
14	Black	95
15	Black	100
16	Black	98
17	Black	95
18	Black	100
19	Black	5
20	Black	100

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CONCLUSION

For all of the foregoing reasons, Ms. Giuffre respectfully requests that the Court deny Defendant's motion in limine and permit her to question Defendant about her relevant alleged consensual adult activities.

Dated: March 22, 2017

Respectfully Submitted,

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By: /s/ Sigrid McCawley

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 22, 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 this day on the individuals identified below via transmission of Notices of Electronic Filing generated by CM/ECF.

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