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 REPLY IN SUPPORT OF HER MOTION TO PRESENT TESTIMONY FROM SARAH KELLEN AND NADIA MARCINKOVA FOR PURPOSES OF OBTAINING AN ADVERSE INFERENCE INSTRUCTION

Sigrid McCawley BOIES SCHILLER FLEXNER LLP 401 E. Las Olas Blvd., Suite 1200 Ft. Lauderdale, FL 33301 (954) 356-0011

Case 1:15-cv-07433-LAP Document 770 Filed 03/23/17 Page 2 of 13

Plaintiff Virginia Giuffre, by and through her undersigned counsel, hereby files this Reply in Support of her Motion *in Limine* to Present Testimony from Sarah Kellen and Nadia Marcinkova for Purposes of Obtaining an Adverse Inference Instruction.

PRELIMINARY STATEMENT

ARGUMENT

I.		
	A.	

Case 1:15-cv-07433-LAP Document 770 Filed 03/23/17 Page 4 of 13

B.			

Case 1:15-cv-07433-LAP Document 770 Filed 03/23/17 Page 5 of 13

C.			
D.			

Case 1:15-cv-07433-LAP Document 770 Filed 03/23/17 Page 6 of 13

E.		

Case 1:15-cv-07433-LAP	Document 770	Filed 03/23/17	Page 7 of 13
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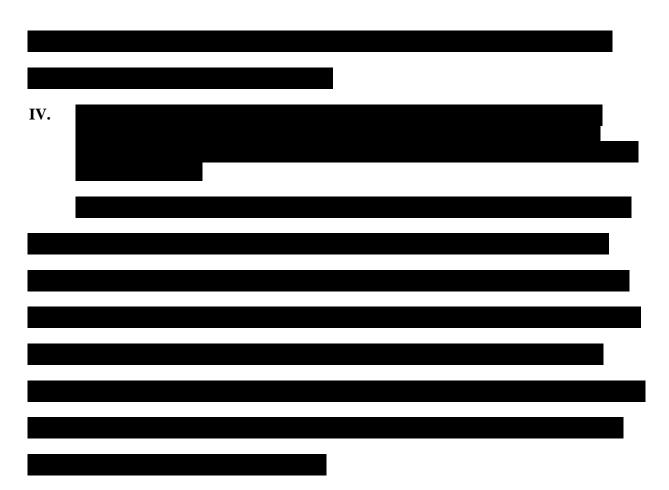
II.		

Case 1:15-cv-07433-LAP Document 770 Filed 03/23/17 Page 8 of 13

Case 1:15-cv-07433-LAP	Document 770	Filed 03/23/17	Page 9 of 13
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III.		

Case 1:15-cv-07433-LAP Document 770 Filed 03/23/17 Page 10 of 13



CONCLUSION

For all of the foregoing reasons, Ms. Giuffre respectfully requests that the Court grant Ms. Giuffre's Motion *in Limine* to Present Testimony from Sarah Kellen and Nadia Marcinkova for Purposes of Obtaining an Adverse Inference Instruction, and accordingly deny Defendant's competing motion.

March 23, 2017

Respectfully Submitted,

BOIES SCHILLER FLEXNER LLP

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23rd 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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¹ 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.

Case 1:15-cv-07433-LAP Document 770 Filed 03/23/17 Page 12 of 13

/s/ Sigrid McCawley Sigrid McCawley

APPENDIX A