

**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

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

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

ARGUMENT

I.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

A.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

B. [REDACTED]

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[REDACTED]

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C. [REDACTED]

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D. [REDACTED]

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E.

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I

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II.

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[REDACTED]

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[REDACTED]

[REDACTED]

III. [REDACTED]

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[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

IV. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

By: /s/ Sigrid McCawley
Sigrid McCawley (Pro Hac Vice)
Meredith Schultz (Pro Hac Vice)
Boies Schiller Flexner LLP
401 E. Las Olas Blvd., Suite 1200
Ft. Lauderdale, FL 33301

(954) 356-0011

David Boies
Boies Schiller Flexner LLP
333 Main Street
Armonk, NY 10504

Bradley J. Edwards (Pro Hac Vice)
FARMER, JAFFE, WEISSING,
EDWARDS, FISTOS & LEHRMAN, P.L.
425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301
(954) 524-2820

Paul G. Cassell (Pro Hac Vice)
S.J. Quinney College of Law
University of Utah
383 University St.
Salt Lake City, UT 84112
(801) 585-5202¹

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.

Laura A. Menninger, Esq.
Jeffrey Pagliuca, Esq.
HADDON, MORGAN & FOREMAN, P.C.
150 East 10th Avenue
Denver, Colorado 80203
Tel: (303) 831-7364
Fax: (303) 832-2628
Email: lmenninger@hmflaw.com
jpagliuca@hmflaw.com

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.

/s/ Sigrid McCawley
Sigrid McCawley

APPENDIX A

