

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 Response in
Opposition to Plaintiff's Motion in Limine to Preclude Defendant
from Calling Plaintiff's Attorneys As Witnesses At Trial**

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 Ms. Maxwell's Response in Opposition to Plaintiff's Motion in Limine to Preclude Defendant from Calling Plaintiff's Attorneys As Witnesses At Trial.

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

[REDACTED]

[REDACTED]

3. Attached as Exhibit B is a true and correct copy of the Emergency Victim's Petition for Enforcement of Crime Victim Rights Act, 18 U.S.C. Section 3771 filed in the Southern District of Florida, Case No. 08-cv-80376-KAM on July 7, 2008.

4. Attached as Exhibit C is a true and correct copy of the Complaint filed in the Circuit Court of the Fifteenth Judicial Circuit in and for Palm Beach County, Florida, Case No. 502009CA040800XXXXMBAG on December 7, 2009.

5. Attached as Exhibit D is a true and correct copy of an article from the FloridaBulldog.org by Dan Christensen, titled President Trump on witness list in Palm Beach lawsuit involving billionaire pedophile, dated March 14, 2017.

6. Attached as Exhibit E is a true and correct copy of the Notice of Filing in the Circuit Court of the Fifteenth Judicial Circuit in and for Palm Beach County, Florida, Case No. 502009CA040800XXXXMBAG dated May 17, 2011.

7. Attached as Exhibit F (filed under seal) is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

8. Attached as Exhibit G is a true and correct copy of a press release in the *Edwards, et. al v. Dershowitz* matter dated April 8, 2016, Bates stamped GM_00523-4.

9. Attached as Exhibit H (filed under seal) are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

10. Attached as Exhibit I (filed under seal) is a true and correct copy of the [REDACTED]

[REDACTED]

[REDACTED]

11. Attached as Exhibit J (filed under seal) is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

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

Executed on March 23, 2017

By: /s/ Jeffrey S. Pagliuca

Jeffrey S. Pagliuca

CERTIFICATE OF SERVICE

I certify that on March 23, 2017, I electronically served this *Declaration Of Jeffrey S. Pagliuca In Support Of Defendant's Response in Opposition to Plaintiff's Motion in Limine to Preclude Defendant from Calling Plaintiff's Attorneys As Witnesses At Trial* via ECF on the following:

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/s/ Nicole Simmons

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