

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 RESPONSE IN OPPOSITION TO DEFENDANT'S OBJECTION TO
PRODUCTION OF [REDACTED] SUBMITTED FOR
IN CAMERA REVIEW AND SECOND MOTION TO COMPEL DEFENDANT TO
PRODUCE HER [REDACTED]**

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Plaintiff Virginia Giuffre, by and through her undersigned counsel, hereby files this
Response In Opposition to Defendant's Objection to Production of [REDACTED]

Submitted for *In Camera* Review and Second Motion to Compel Defendant to Produce Her [REDACTED]
[REDACTED]

PRELIMINARY STATEMENT

On August 9, 2016, Ms. Giuffre submitted a motion to compel seeking, among other
things, [REDACTED] [REDACTED]

[REDACTED] This issue was fully briefed in Defendant's Response on
August 19, 2016 (DE 383 at 9-11) and Ms. Giuffre's Reply on August 24, 2017 (DE 397 at 2-4).

[REDACTED]

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CONCLUSION

For the foregoing reasons, Ms. Giuffre respectfully requests that the Court affirm its March 23, 2017, holding that the [REDACTED] submitted by Defendant for *in camera* review is relevant to this action and Order the production of [REDACTED]

[REDACTED]

Dated: April 4, 2017

Respectfully Submitted,

BOIES SCHILLER FLEXNER LLP

By: /s/ Sigrid McCawley

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CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on April 4, 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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