

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

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

---

**MS. GIUFFRE’S NOTICE OF FILING RESPONSE TO  
PROPOSED INTERVENER MICHAEL CERNOVICH D/B/A CERNOVICH  
MEDIA’S OPPOSITION TO NOTICE OF PLAINTIFF’S PROPOSED  
REDACTIONS TO THIS COURT’S ORDER DENYING SUMMARY  
JUDGMENT [DE 833]**

Ms. Giuffre hereby responds and requests that this Court exclude Proposed Intervener Michael Cernovich D/B.A Cernovich Media’s Opposition to Notice of Plaintiff’s Proposed Redactions to this Court’s Order Denying Summary Judgment [DE 833], and hereby states as follows.

On January 19, 2017, Mr. Cernovich moved the Court to be allowed to intervene in this case for the purported purpose of publishing confidential materials [DE 550]. This Court has not granted Mr. Cernovich intervention under Rule 24(b).

Accordingly, he is not a party of this litigation, and has no standing to bring the instant opposition. *See Esther Sadowsky Testamentary Trust v. Federal Housing Finance Agency*, 412 Fed.Appx. 361, 363, 2011 WL 744962, at \*1 (2d Cir. March 4, 2011) (third party lacked standing to appeal district court’s ruling where the third party’s motion to intervene was not granted).

Accordingly, for the reasons stated above, Ms. Giuffre respectfully requests that this Court exclude Proposed Intervener Michael Cernovich D/B.A Cernovich Media's Opposition to Notice of Plaintiff's Proposed Redactions to this Court's Order Denying Summary Judgment [DE 833].

Dated: April 18, 2017

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Meredith Schultz

Meredith Schultz (Pro Hac Vice)  
Sigrid McCawley (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) 585-5202<sup>1</sup>

---

<sup>1</sup> 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.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on the 18<sup>th</sup> day of April, 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.

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

/s/ Meredith Schultz  
Meredith Schultz, Esq.