



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

## II. LEGAL ARGUMENT

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

### III. RELIEF REQUESTED

Due of this flagrant and material violations of this Court's Order, combined with Defendant's willful violations of this Court's previous Orders, Ms. Giuffre hereby moves the Court to enforce its Order and issue an Order to Show Cause why Defendant should not be held in civil contempt for violation of this Court's Order under Fed. R. Civ. P. 37(b)(2)(A)(vii).

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**IV. CONCLUSION**

For the foregoing reasons, Ms. Giuffre respectfully requests that the Court issue an Order to Show Cause why Defendant should not be held in civil contempt pursuant to Fed. R. Civ. P. 37(b)(2)(A)(vii) for her willful violation of this Court's Order, leave to ask Defendant questions about [REDACTED] at her May 11, 2017 deposition, and such further relief that this Court deems just and appropriate.

Dated: May 5, 2017

Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on the 5th day of May, 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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<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.