

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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VIRGINIA L. GIUFFRE,
PLAINTIFF,
V.
GHISLAINE MAXWELL,
DEFENDANT.
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15-cv-07433-RWS

**DECLARATION OF JEFFREY S. PAGLIUCA IN SUPPORT OF COMBINED
SUPPLEMENT TO DEFENDANT’S OBJECTIONS TO MOTIONS FOR ADMISSION
PRO HAC VICE BY PAUL G. CASSELL, AND BRADLEY EDWARDS,**

I, Jeffrey S. Pagliuca, declare as follows:

1. I am an attorney at law duly licensed in the State of New York and admitted Pro Hac Vice, to practice in the United States District Court for the Southern District of New York in this matter. I am a member of the law firm Haddon, Morgan and Foreman. P.C., counsel of record for Defendant Ghislaine Maxwell (“Maxwell”) in this action. I respectfully submit this declaration in support of Maxwell’s Combined Supplement to Objections to Motions for Admission Pro Hac Vice by Paul G. Cassell, and Bradley G. Edwards.

2. Attached as Exhibit A is a true and correct copy of an online Article published on the Gate Stone Institute website, captioned “Lawyers Acknowledge Mistake In Filing Sexual Misconduct Charges Against Professor Dershowitz” last issued on April 19, 2016. (Available at <http://www.gatestoneinstitute.org/7808/lawyers-acknowledge-mistake-in-filing-sexual>).

3. Attached as Exhibit B is a true and correct copy of the complaint filed against Mr. Edwards captioned Epstein v. Rothstein, Edwards, and L.M. filed in the Circuit Court of the Fifteenth Judicial Circuit in and for Palm Beach County, Florida.

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 19, 2016 in Denver, Colorado.

By: /s/ Jeffrey S. Pagliuca
Jeffrey S. Pagliuca