

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

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

_____ /

**REPLY IN SUPPORT OF NON-PARTY'S MOTION FOR PROTECTIVE ORDER AND
OPPOSITION TO DEFENDANT'S COMBINED MOTION TO COMPEL NON-PARTY
WITNESS TO PRODUCE DOCUMENTS AND RESPOND TO DEPOSITION**

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Non-party, [REDACTED], by and through her undersigned counsel, hereby files this Reply in Support of Her Motion for Protective Order (DE 640) and Opposition to Defendant's Combined Motion to Compel Non-Party Witness to Produce Documents and Respond to Deposition (DE 655).

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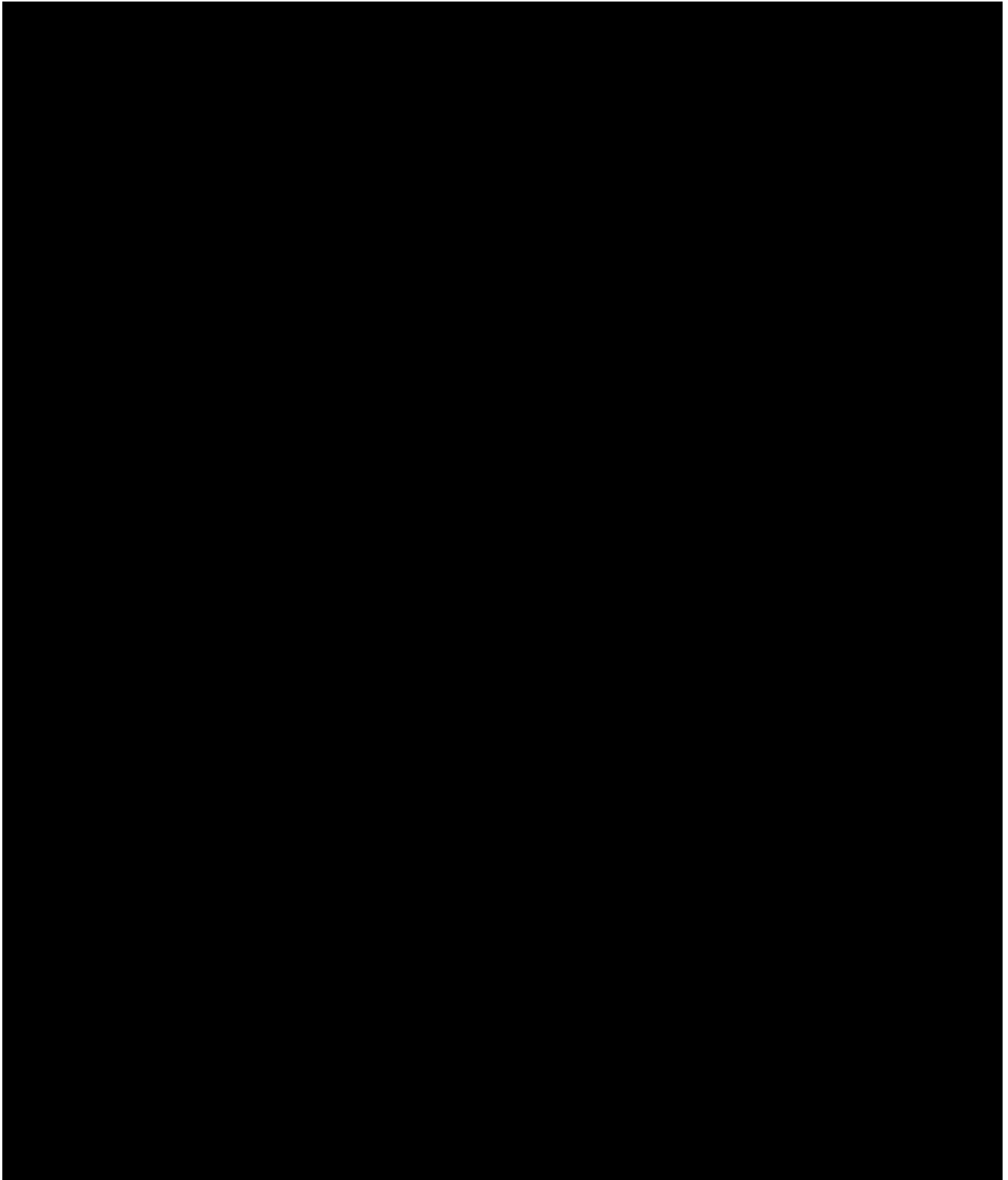
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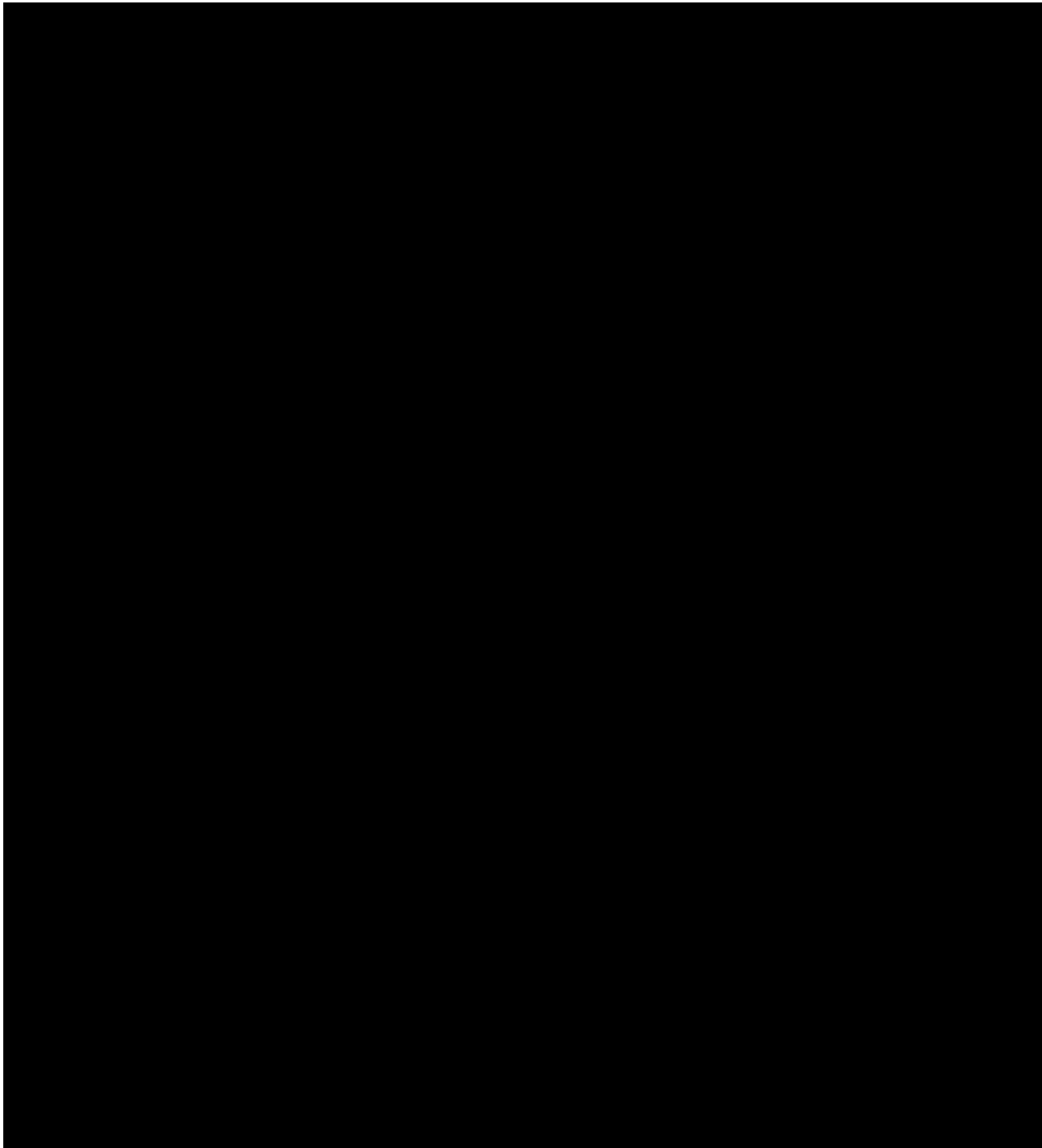
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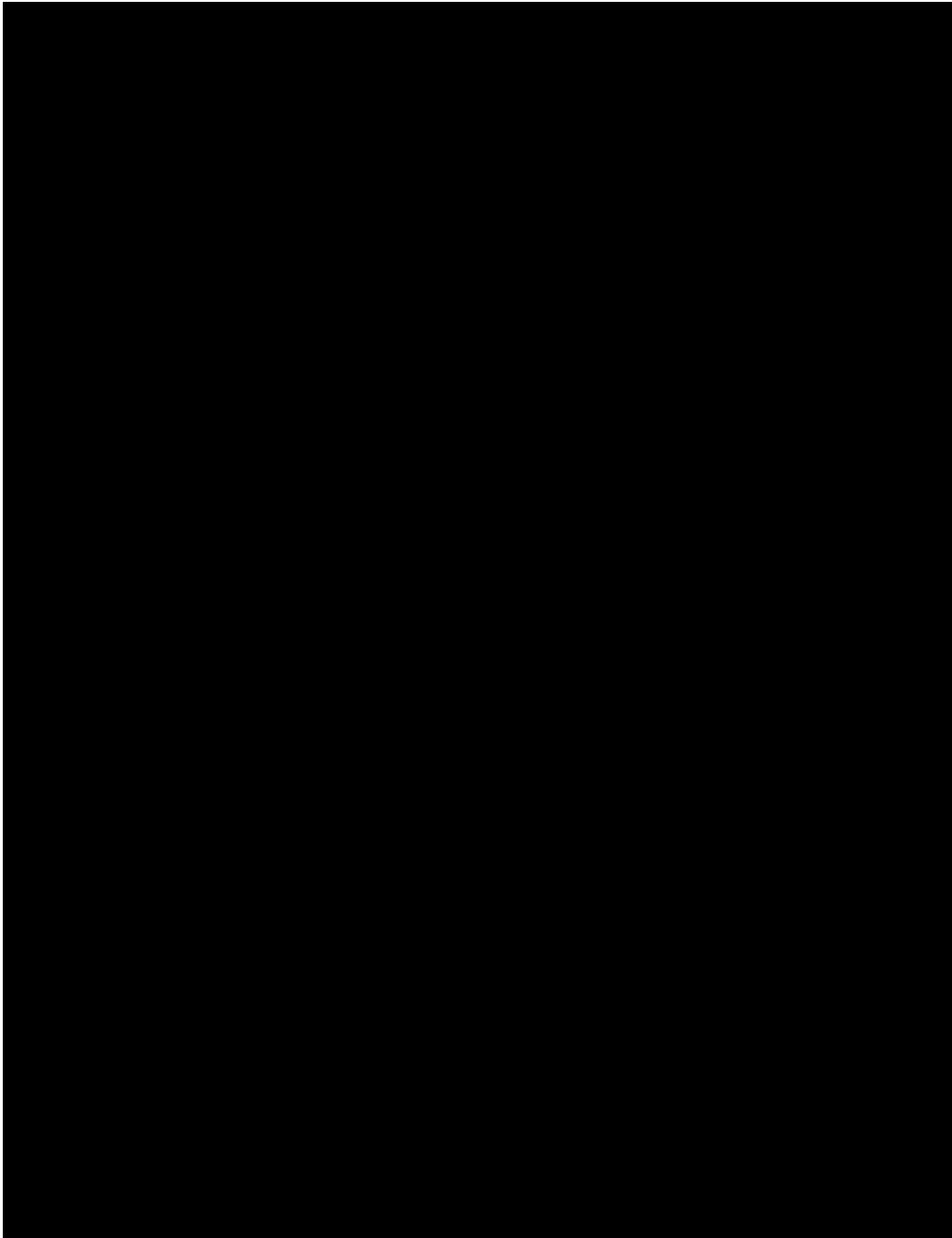
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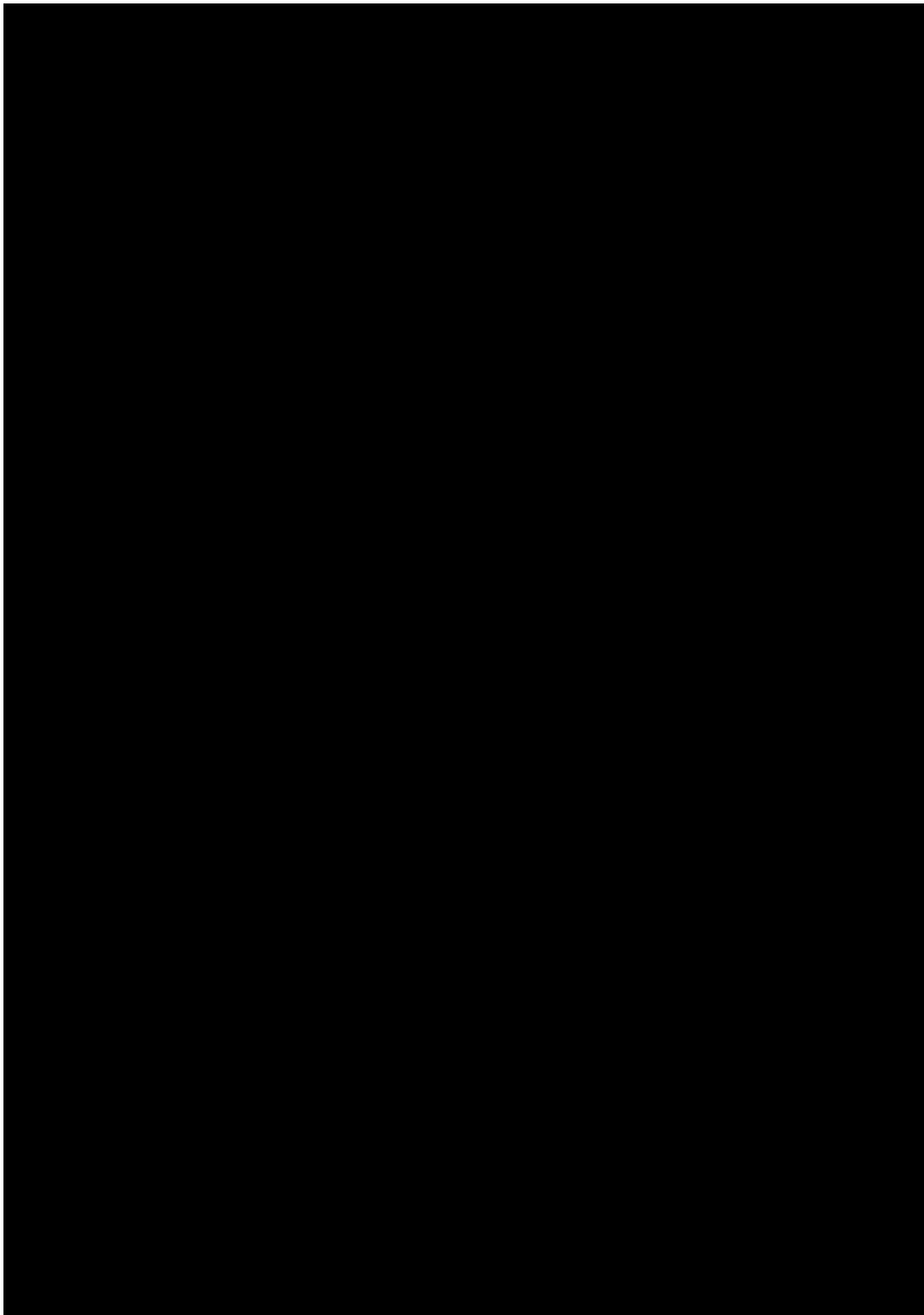
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Dated: March 7, 2017

Respectfully Submitted,

By: /s/ J. Stanley Pottinger

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Counsel for [REDACTED]

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 7th of March, 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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⁴ 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.