

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

15-cv-07433-RWS

-----X

Motion to Appoint Special Master to Preside Over Third Deposition of Defendant

Laura A. Menninger
Jeffrey S. Pagliuca
Ty Gee
HADDON, MORGAN AND FOREMAN, P.C.
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Defendant Ghislaine Maxwell (“Ms. Maxwell”), pursuant to Federal Rule of Civil Procedure 53, files this Motion to Appoint a Special Master to Preside over the Third Deposition of Defendant Ghislaine Maxwell, and states as follows:

STATEMENT OF CONFERRAL

[REDACTED]

[REDACTED]

INTRODUCTION

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CONCLUSION

[REDACTED]

[REDACTED]

[REDACTED]

Dated: April 11, 2017

Respectfully submitted,

/s/ Laura A. Menninger

Laura A. Menninger (LM-1374)

Jeffrey S. Pagliuca (*pro hac vice*)

Ty Gee (*pro hac vice*)

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CERTIFICATE OF SERVICE

I certify that on April 11, 2017, I electronically served this *Motion to Appoint Special Master to Preside Over Third Deposition of Defendant* via ECF on the following:

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