

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

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

PLAINTIFF'S RESPONSE TO DEFENDANT'S
MOTION FOR BIFURCATED TRIAL RELATING TO PUNITIVE DAMAGES
AND EXCLUSION OF REFERENCES TO DEFENDANT'S
FINANCIAL INFORMATION

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PRELIMINARY STATEMENT

A horizontal bar chart consisting of 15 bars. The bars are arranged in descending order of length from top to bottom. The 10th bar from the top is light gray, while all other bars are black. The bars vary significantly in length, with the top bar being the longest and the bottom bar being the shortest.

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Dated: March 22, 2017

Respectfully Submitted,

BOIES SCHILLER FLEXNER LLP

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CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on March 22, 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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⁵ 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.