UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

	X	
VIRGINIA L. GIUFFRE,		
Plaintiff,		
V.		
GHISLAINE MAXWELL,		15-cv-07433-RWS
Defendant.		
Defendant.		
	\mathbf{v}	

DEFENDANT'S MOTION IN LIMINE TO EXCLUDE EXPERT TESTIMONY AND OPINION OF CHRIS ANDERSON

Laura A. Menninger Jeffrey S. Pagliuca HADDON, MORGAN, AND FOREMAN, P.C. 150 East 10th Avenue Denver, CO 80203 303.831.7364

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A	A. Mr. Anderson's opinion is not helpful because it is not related to a fact at issue in this common description.	
E	3. Mr. Anderson relies on insufficient facts, including an inability to identify the alleged defamatory statement	9
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Ms. Maxwell requests a pre-trial hearing on this issue and that the Court issues a ruling that the opinions expressed in Exhibit A are inadmissible at trial for the above stated reasons.

Dated: January 5, 2017

Respectfully submitted,

/s/ Jeffrey S. Pagliuca

Laura A. Menninger (LM-1374)
Jeffrey S. Pagliuca (*pro hac vice*)
HADDON, MORGAN AND FOREMAN, P.C.
150 East 10th Avenue
Denver, CO 80203

Phone: 303.831.7364 Fax: 303.832.2628 Imenninger@hmflaw.com

Attorneys for Ghislaine Maxwell

CERTIFICATE OF SERVICE

I certify that on January 5, 2017, I electronically served this *Defendant's Motion in Limine to Exclude Expert Testimony and Opinion of Chris Anderson* via ECF on the following:

Sigrid S. McCawley
Meredith Schultz
BOIES, SCHILLER & FLEXNER, LLP
401 East Las Olas Boulevard, Ste. 1200
Ft. Lauderdale, FL 33301
smccawley@bsfllp.com
mschultz@bsfllp.com

Bradley J. Edwards FARMER, JAFFE, WEISSING, EDWARDS, FISTOS & LEHRMAN, P.L. 425 North Andrews Ave., Ste. 2 Ft. Lauderdale, FL 33301 brad@pathtojustice.com Paul G. Cassell 383 S. University Street Salt Lake City, UT 84112 cassellp@law.utah.edu

J. Stanley Pottinger 49 Twin Lakes Rd. South Salem, NY 10590 StanPottinger@aol.com

/s/ Nicole Simmons

Nicole Simmons