United States District Court Southern District of New York

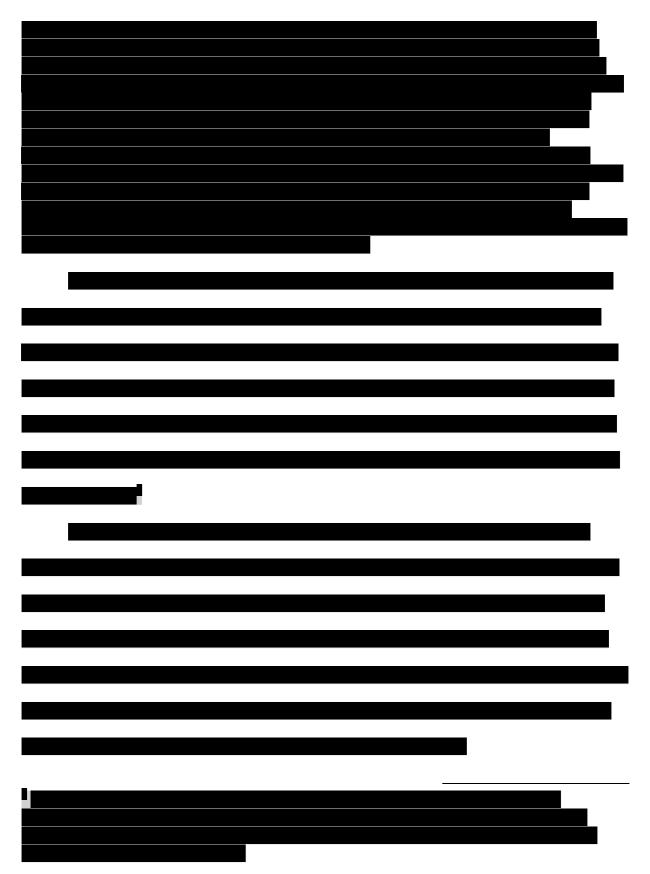
| Virginia L. Giuffre, | |
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| Plaintiff, | Case No.: 15-cv-07433-RWS |
| v. | |
| Ghislaine Maxwell, | |
| Defendant. | |
| | PEL THE PRODUCTION OF DOCUMENTS ON AND IMPROPER CLAIM OF PRIVILEGE |
| Plaintiff Virginia Giuffre, by and th | rough her undersigned counsel, respectfully submits |
| this Motion to Compel Production of Docu | ments |
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| For the reasons se | t forth below, this Court should grant Plaintiff's |
| Motion in its entirety. | |
| I. <u>FACTUAL BACKGROUND¹</u> | |
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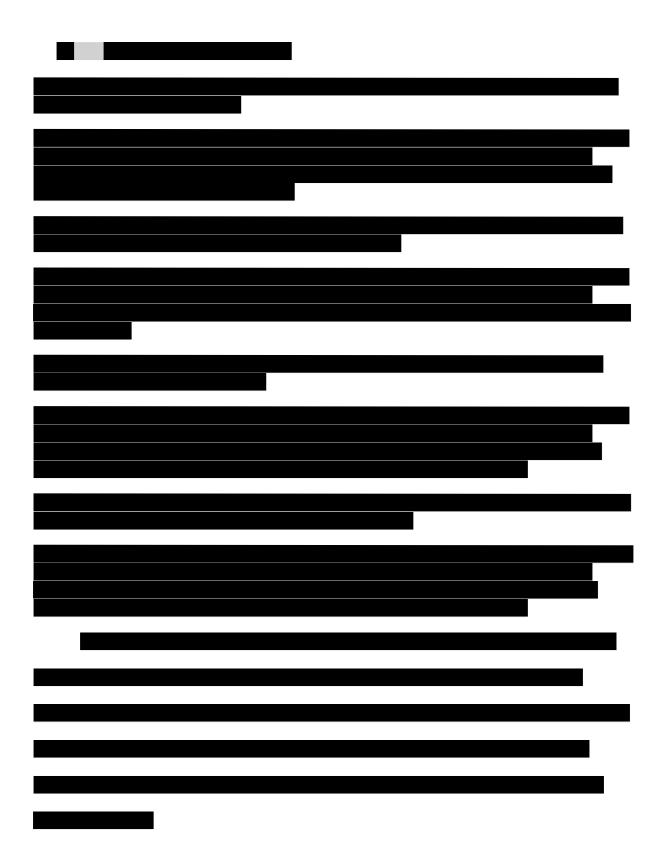
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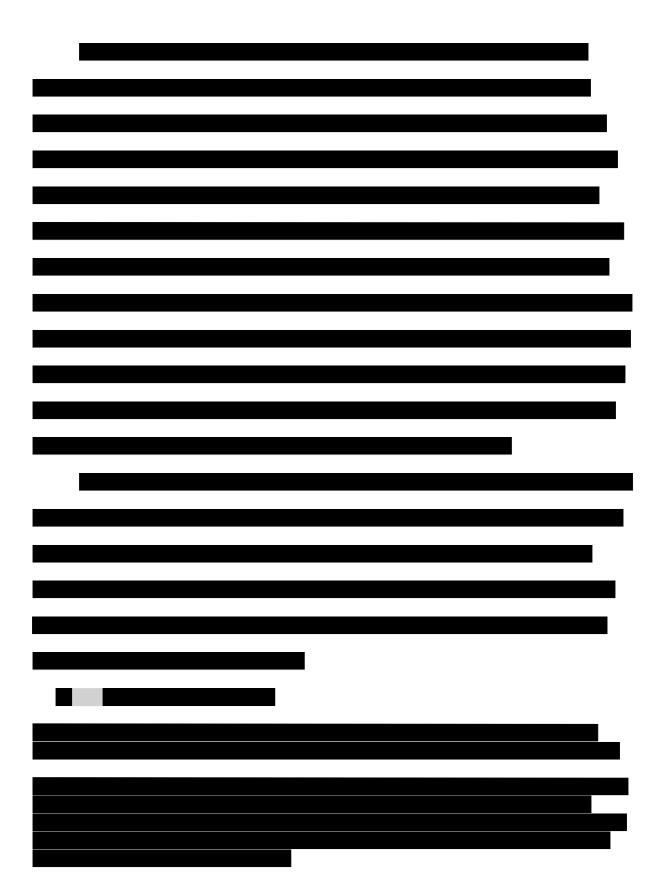
| II. | LEGAL ARGUMENT |
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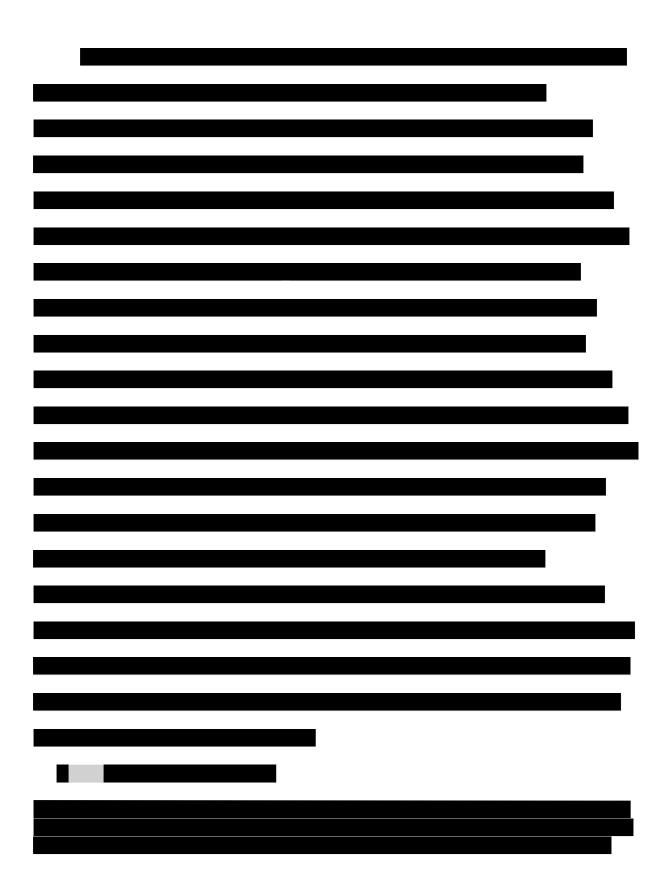


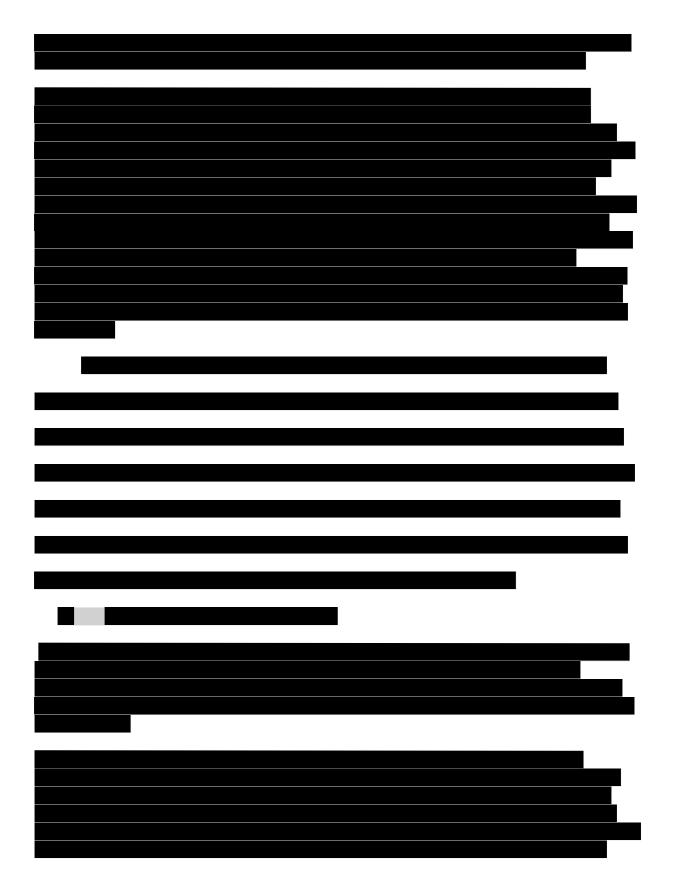


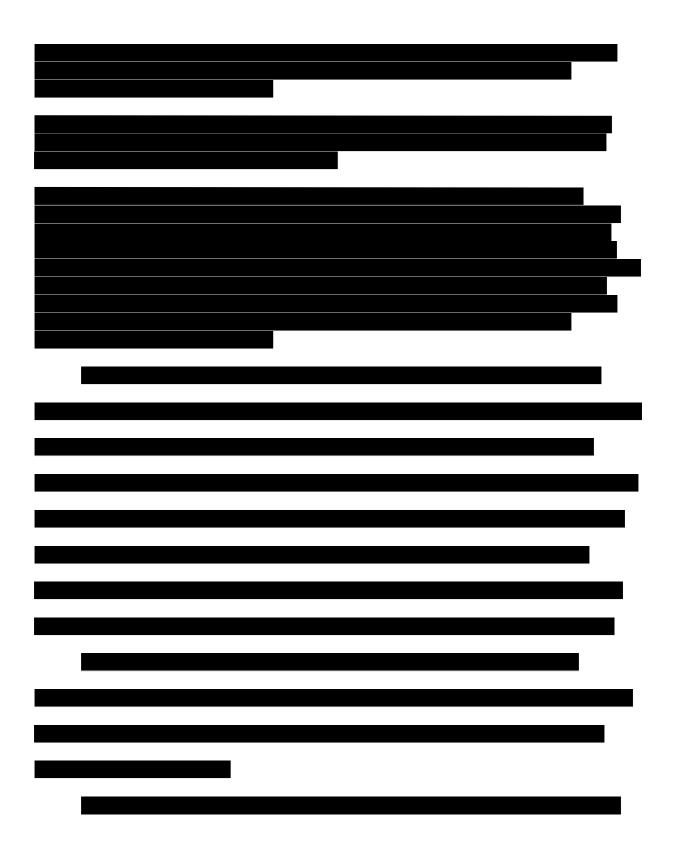


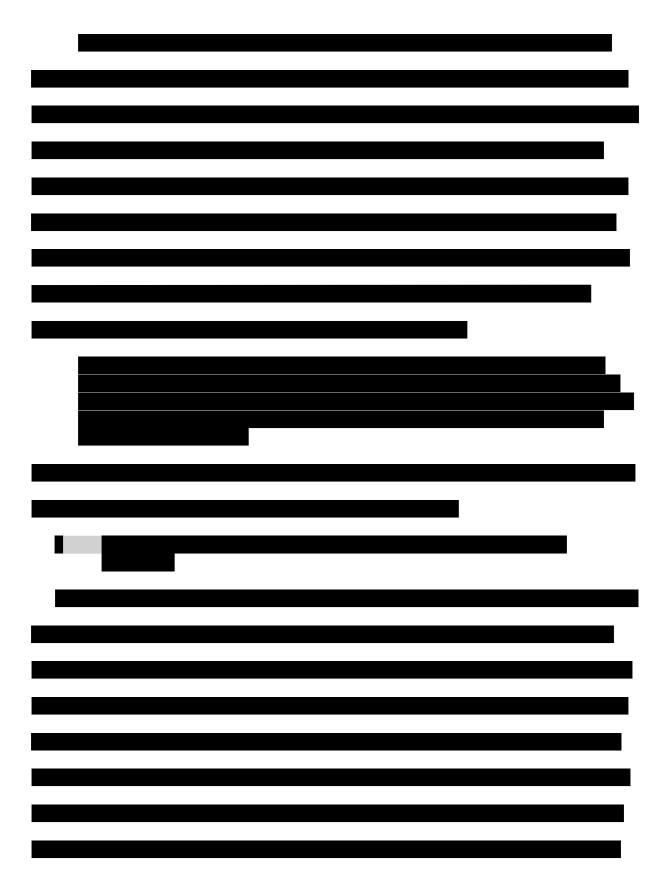


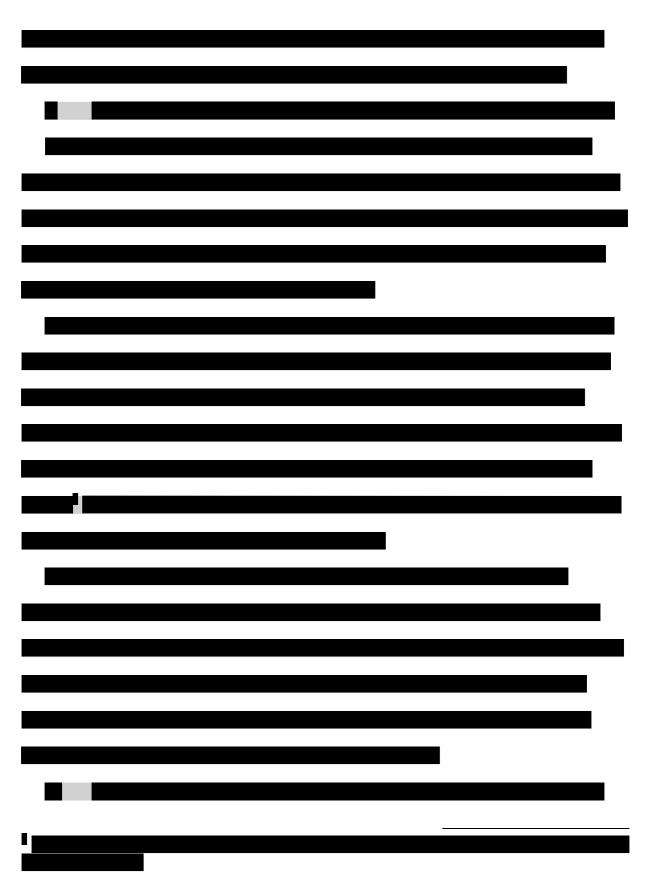












| II. <u>CONCLUSION</u> | | |
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Dated: August 9, 2016

Respectfully Submitted, BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley
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⁶ 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.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 9th day of August, 2016, 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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/s/ Sigrid S. McCawley
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