

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

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VIRGINIA L. GIUFFRE,

Plaintiff,
v.
GHISLAINE MAXWELL,

Defendant.

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15-cv-07433-RWS

**Combined Supplement to Defendant Ghislaine Maxwell's
Objections to Motions for Admission Pro Hac Vice by
Paul G. Cassell, and Bradley J. Edwards**

Laura A. Menninger
Jeffrey S. Pagliuca
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INTRODUCTION

Defendant Ghislane Maxwell, through her attorneys, Jeffrey S. Pagliuca and Laura A. Menninger, supplements her Objection to Motion to Appear Pro Hac Vice of Paul G. Cassell Or, In the Alternative To Modify the Protection Order To Restrict Mr. Cassell's Access to Information Designated as Confidential and Objection to Motion to Appear Pro Hac Vice of Bradley James Edwards or, Alternatively, to Modify the Protection Order to Restrict Mr. Edwards's Access to Information Designated Confidential ("Objections" or "Objection")

ARGUMENT

Paul G. Cassell filed his Motion for Admission Pro Hac Vice on April 5, 2016, Doc. #80.

Ms. Maxwell filed her letter Objection to the Motion for Admission Pro Hac Vice filed by Mr. Cassell on April 6, 2016.

Mr. Edwards filed his Motion for Admission Pro Hac Vice, Doc. # 86, on April 7, 2016. An Objection to this motion was lodged by Ms. Maxwell on April 8, 2016, Doc. # 88.

Subsequent to the filing of the Objections, Ms. Maxwell obtained a statement issued by Mr. Cassell and Mr. Edwards related to *Edwards and Cassell v. Dershowitz*, 15-000072, pending in Circuit Court in Broward County Florida, in which they admitted that:

Given the events that have transpired since the filing of the documents in the federal court and in this action in which Dershowitz was accused of sexual misconduct, including the court order striking the allegations in the federal court filings, and the records and other documents by the parties, Edwards and Cassell acknowledge that it was a mistake to have filed sexual misconduct accusations against Dershowitz; and the sexual misconduct accusations made in all public filings (including all exhibits) are hereby withdrawn. Dershowitz also withdraws his accusations that Edwards and Cassell acted unethically.

See, Pagliuca Decl. at Exhibit A, online article published on the Gates Stone Institute website captioned “Lawyers Acknowledge Mistake In Filing Sexual Misconduct Charges Against Professor Dershowitz”.

Subsequent to the filing of the Objections, Ms. Maxwell obtained a copy of the complaint filed against Mr. Edwards captioned Epstein v. Rothstein, Edwards, and L.M. filed in the Circuit Court of the Fifteenth Judicial Circuit in and for Palm Beach County, Florida. See, Pagliuca Decl. at Exhibit B.

The information attached is relevant to the issues raised in the Objections to the Motions for Admission Pro Hac Vice and will be relied on by counsel for Ms. Maxwell at the hearing on these motions scheduled for April 21, 2016.

Dated: April 20, 2016

Respectfully submitted,

/s/ Jeffrey S. Pagliuca

Laura A. Menninger (LM-1374)

Jeffrey S. Pagliuca

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CERTIFICATE OF SERVICE

I certify that on April 20, 2016, I electronically served this *COMBINED SUPPLEMENT TO DEFENDANT GHISLAINE MAXWELL'S OBJECTIONS TO MOTIONS FOR ADMISSION PRO HAC VICE BY PAUL G. CASSELL, AND BRADLEY J. EDWARDS* via ECF on the following:

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/s/ Nicole Simmons

Nicole Simmons