

**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

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**Renewed Motion to Compel Non-Party Witness
to Produce Documents and Respond to Deposition Questions and
to Complete Search of ESI**

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| A. Ms. Ransome and Plaintiff’s Counsel are purposefully hiding responsive and relevant documents | 11 |
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Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on April 20, 2017, I electronically served this *Defendant's Renewed Motion to Compel Non-Party Witness to Respond to Deposition Questions and Complete Search of ESI* via ECF on the following:

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