

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
VIRGINIA L. GIUFFRE,  
Plaintiff,  
v.  
GHISLAINE MAXWELL,  
Defendant.  
-----X

15-cv-07433-RWS

**Defendant's Motion *in Limine* to Exclude  
Police Reports and Other Inadmissible Hearsay**

Laura A. Menninger  
Jeffrey S. Pagliuca  
Ty Gee  
HADDON, MORGAN AND FOREMAN, P.C.  
150 East 10<sup>th</sup> Avenue  
Denver, CO 80203  
303.831.7364

**TABLE OF CONTENTS**

INTRODUCTION ..... 1

ARGUMENT ..... 2

I. THE DOCUMENTS, STATEMENTS AND RECORDINGS ARE INADMISSIBLE  
HEARSAY ..... 6

II. THERE IS NO APPLICABLE HEARSAY EXCEPTION ..... 8

    A. The Documents Are Not Business Records ..... 8

    B. The Documents Are Not Public Records ..... 9

    C. The Residual Exception Does Not Apply ..... 9

    D. Rules 401, 403, and 404(b) Require Exclusion of the Documents and Statements ..... 11

CONCLUSION ..... 11

CERTIFICATE OF SERVICE ..... 13

**PAGES 1-11**

**REDACTED**

Dated: March 3, 2017

Respectfully submitted,

/s/ Jeffrey S. Pagliuca

Laura A. Menninger (LM-1374)

Jeffrey S. Pagliuca (*pro hac vice*)

Ty Gee (*pro hac vice*)

HADDON, MORGAN AND FOREMAN, P.C.

150 East 10<sup>th</sup> Avenue

Denver, CO 80203

Phone: 303.831.7364

Fax: 303.832.2628

lmenninger@hmflaw.com

*Attorneys for Ghislaine Maxwell*

**CERTIFICATE OF SERVICE**

I certify that on March 3, 2017, I electronically served *this Defendant's Motion in Limine to Exclude Police Reports and Other Inadmissible Hearsay* 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