## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

	-X	
VIRGINIA L. GIUFFRE,  Plaintiff, v.  GHISLAINE MAXWELL,  Defendant.	-A	15-cv-07433-RWS

### DEFENDANT'S REPLY IN SUPPORT OF HER MOTION IN LIMINE TO EXCLUDE EXPERT TESTIMONY AND OPINION OF DIANNE C. FLORES

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

# **PAGES 1-7**

### **REDACTED**

Dated: February 10, 2017

Respectfully submitted,

#### /s/ Jeffrey S. Pagliuca

Laura A. Menninger (LM-1374)
Jeffrey S. Pagliuca (pro hac vice)
Ty Gee (pro hac vice pending)
HADDON, MORGAN AND FOREMAN, P.C.
150 East 10<sup>th</sup> 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 February 10, 2017, I electronically served this *Defendant's Reply In Support Of Her Motion in Limine to Exclude Expert Testimony and Opinion of Dianne C. Flores* 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