UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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

Defendant's Reply in Support of Motion in Limine to Exclude Deposition Testimony of Sarah Kellen and Nadia Marcinkova or Any Witness <u>Invoking Their Fifth Amendment Privilege</u>

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

PAGES 1-7

REDACTED

CONCLUSION

Dated: March 30, 2017

Respectfully submitted,

/s/ Laura A. Menninger

Laura A. Menninger (LM-1374)
Jeffrey S. Pagliuca (pro hac vice)
Ty Gee (pro hac vice)
HADDON, MORGAN AND FOREMAN, P.C.
150 East 10th 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 March 30, 2017, I electronically served this *Defendant's Reply in Support of Motion in Limine to Exclude Deposition Testimony of Sarah Kellen and Nadia Marcinkova or Any Witness Invoking Their Fifth Amendment Privilege* 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

Paul G. Cassell 383 S. University Street Salt Lake City, UT 84112 cassellp@law.utah.edu

Bradley J. Edwards FARMER, JAFFE, WEISSING, EDWARDS, FISTOS & LEHRMAN, P.L. 425 North Andrews Ave., Ste. 2 Ft. Lauderdale, FL 33301 brad@pathtojustice.com J. Stanley Pottinger 49 Twin Lakes Rd. South Salem, NY 10590 StanPottinger@aol.com

/s/ Nicole Simmons

Nicole Simmons