

**United States District Court
Southern District of New York**

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

**PLAINTIFF MS. GIUFFRE'S REPLY IN
SUPPORT OF HER MOTION *IN LIMINE* TO PRESENT
ALL EVIDENCE OF DEFENDANT'S INVOLVEMENT IN
EPSTEIN SEXUAL ABUSE AND SEX TRAFFICKING**

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Plaintiff, Ms. Virginia Giuffre, respectfully submits this reply in support of her motion *in limine* to admit at trial all evidence concerning Defendant's involvement in Epstein's sexual abuse and trafficking organization.

PRELIMINARY STATEMENT

Bar Index	Bar Color	Approximate Length (0-100)
1	Black	95
2	Black	98
3	Black	100
4	Black	97
5	Black	98
6	Black	95
7	Black	97
8	Black	98
9	Black	100
10	Light Gray	100
11	Black	70
12	Black	95
13	Black	98
14	Black	100
15	Black	95
16	Black	100
17	Light Gray	85
18	Black	95

Response	Percentage
Yes	100%
No	100%
Don't know	100%
Refuse to answer	100%

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Government	Percentage
Current government	85%
Previous government	15%

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Bar Index	Bar Color	Approximate Length (%)
1	Black	90
2	Black	95
3	Black	92
4	Black	85
5	Black	75
6	Black	90
7	Black	95
8	Black	92
9	Black	85
10	Black	90
11	Black	45
12	Black	90
13	Black	95
14	Black	92
15	Black	85
16	Black	90
17	Black	40
18	Black	90
19	Black	95
20	Black	92

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A horizontal bar chart consisting of 20 bars. The bars are arranged vertically. Most bars are solid black. Two bars have a small grey segment at the beginning, followed by a black segment. The lengths of the bars vary, with some being nearly full-width and others being significantly shorter.

A horizontal bar chart consisting of 20 bars. The bars are arranged in descending order of length from top to bottom. Most bars are black, but there are three light gray bars near the bottom. The bars vary significantly in length, with the top bar being the longest and the bottom bars being the shortest.

Category	Value (approximate percentage)
1	100%
2	95%
3	100%
4	100%
5	95%
6	98%
7	100%
8	100%
9	100%
10	98%
11	85%
12	98%
13	100%
14	100%
15	100%
16	100%
17	100%
18	100%
19	100%
20	100%

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Response	Percentage
Yes	75%
No	25%

A horizontal bar chart consisting of 20 bars. The bars are arranged vertically. Most bars are solid black. The first bar has a small grey segment at the start, followed by a small black segment, and then a long black segment. The second bar has a small grey segment at the start, followed by a long black segment. The third bar is solid black. The fourth bar is solid black. The fifth bar is solid black. The sixth bar is solid black. The seventh bar is solid black. The eighth bar is solid black. The ninth bar is solid black. The tenth bar is solid black. The eleventh bar is solid black. The twelfth bar is solid black. The thirteenth bar is solid black. The fourteenth bar is solid black. The fifteenth bar is solid black. The sixteenth bar is solid black. The seventeenth bar is solid black. The eighteenth bar is solid black. The nineteenth bar has a small grey segment at the start, followed by a long black segment. The twentieth bar is solid black.

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This image consists of ten solid black horizontal bars stacked vertically. The bars vary in length, with most spanning nearly the entire width of the page and one at the bottom being significantly shorter. These bars represent redacted information from a document.

Bar Index	Color	Relative Length (approximate)
1	Light Gray	10
2	Black	95
3	Black	100
4	Black	92
5	Black	94
6	Black	96
7	Black	100
8	Black	95
9	Black	98
10	Black	100
11	Black	95
12	Black	98
13	Black	100
14	Black	92
15	Black	85

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Government	Percentage
Current government	85%
Previous government	15%

Bar Index (from top)	Bar Color	Approximate Length (0-100)
1	Black	95
2	Black	98
3	Black	100
4	Black	99
5	Black	97
6	Black	96
7	Black	99
8	Black	100
9	Black	98
10	Black	85
11	Black	90
12	Black	100
13	Black	95
14	Black	99
15	Black	92
16	Black	94
17	Black	97
18	Black	99
19	Gray	100
20	Black	98

A horizontal bar chart consisting of 20 bars. The bars are arranged vertically. Most bars are solid black. There are four bars that have a light gray segment at the beginning, followed by a black segment. The lengths of the bars vary significantly, with some being nearly full-width and others being much shorter. The bars are separated by small gaps.

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Dated: March 24, 2017

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 24th day of March, 2017, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I also certify that the foregoing document is being served this day on the individuals identified below via transmission of Notices of Electronic Filing generated by CM/ECF.

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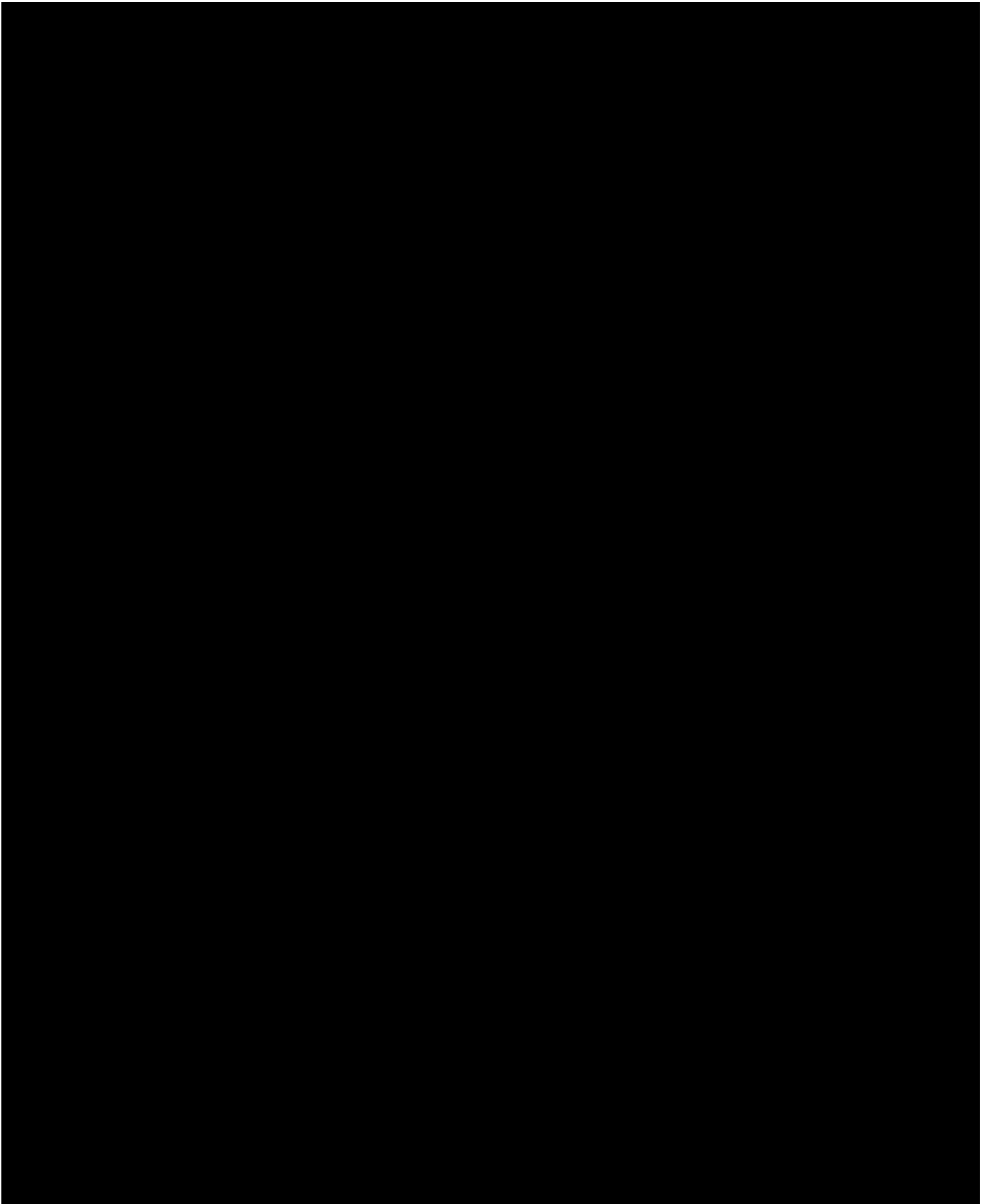
/s/ Sigrid S. McCawley
Sigrid S. McCawley

APPENDIX A

EVIDENCE OF DEFENDANT'S INVOLVEMENT IN EPSTEIN'S ABUSE AND TRAFFICKING

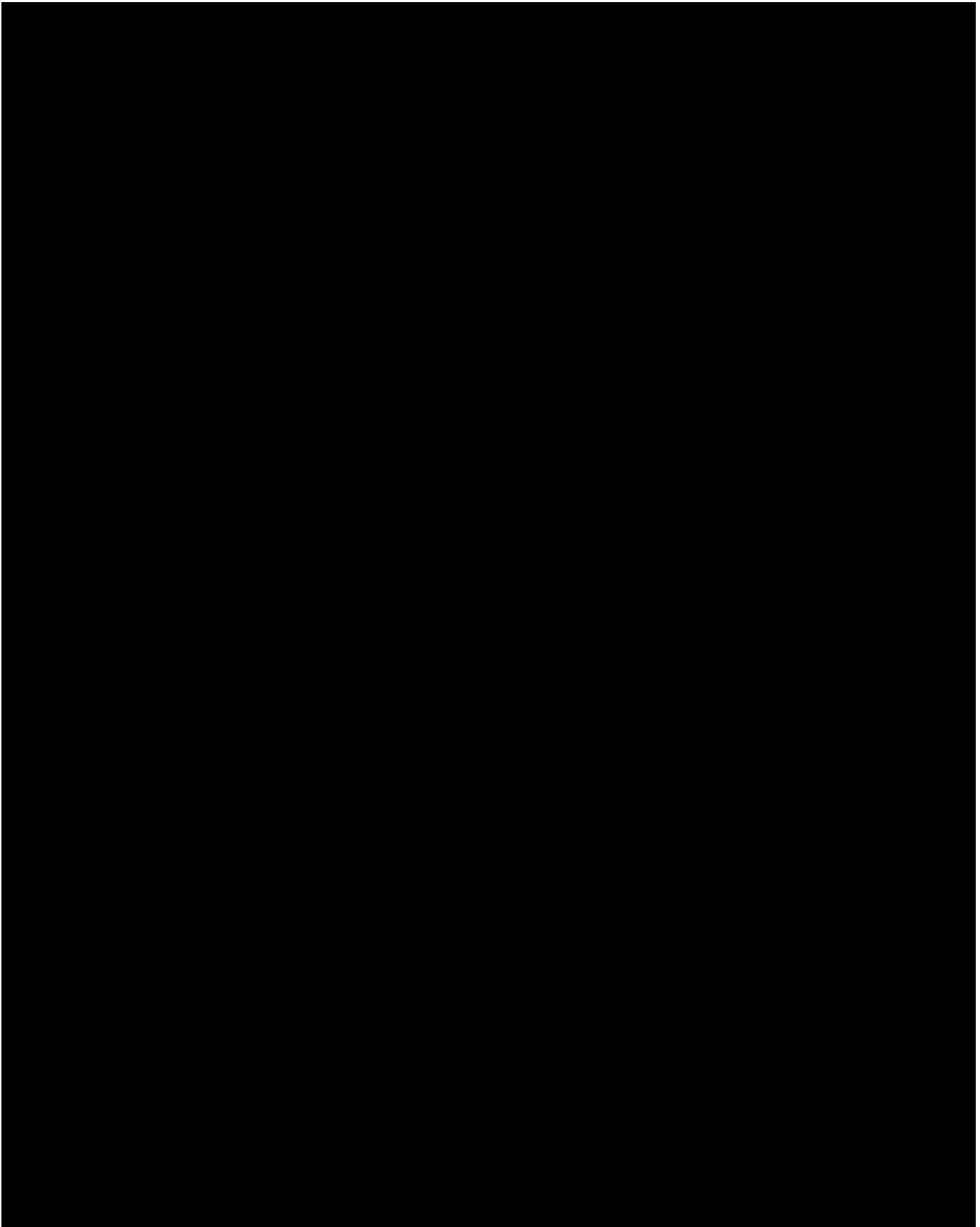
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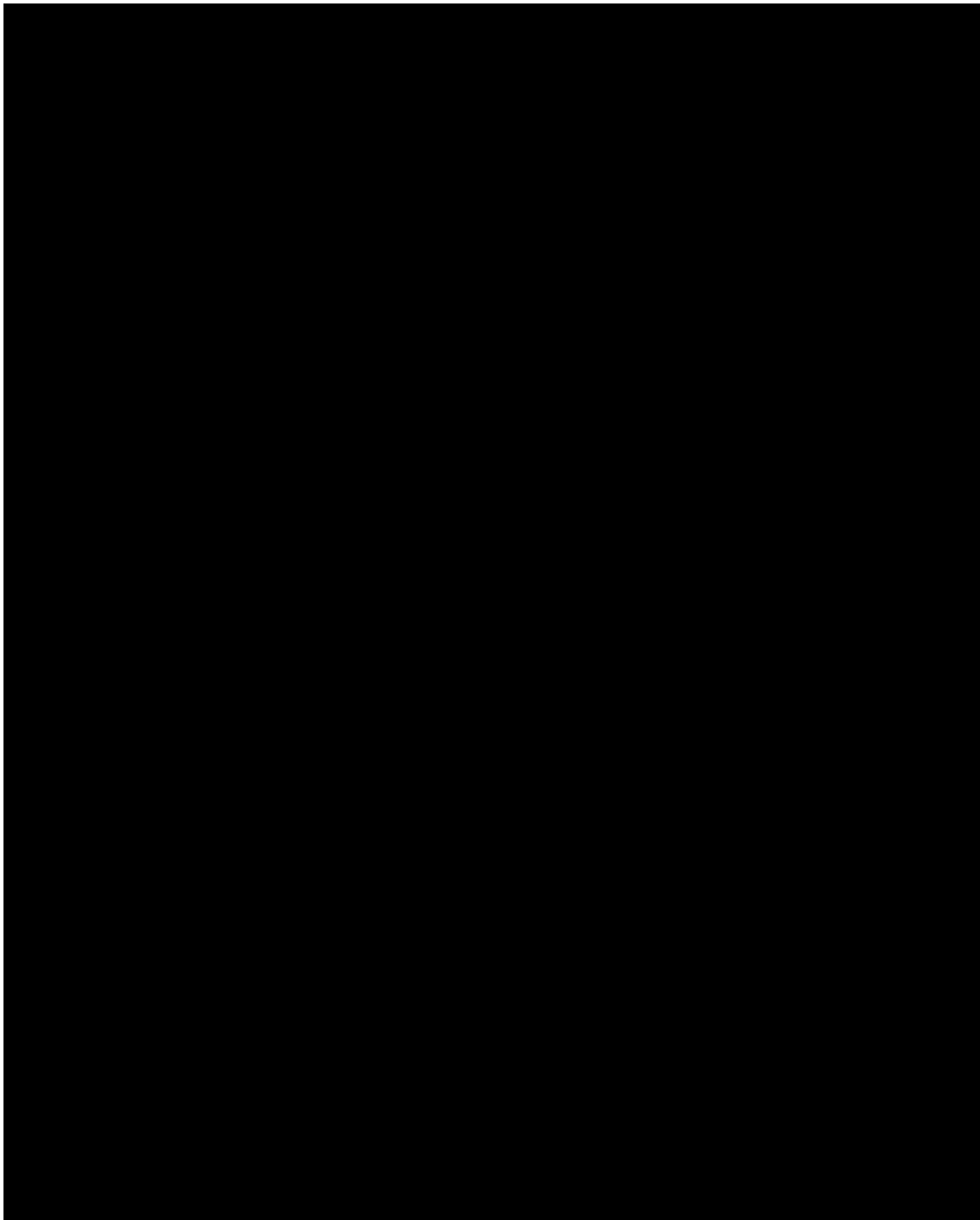
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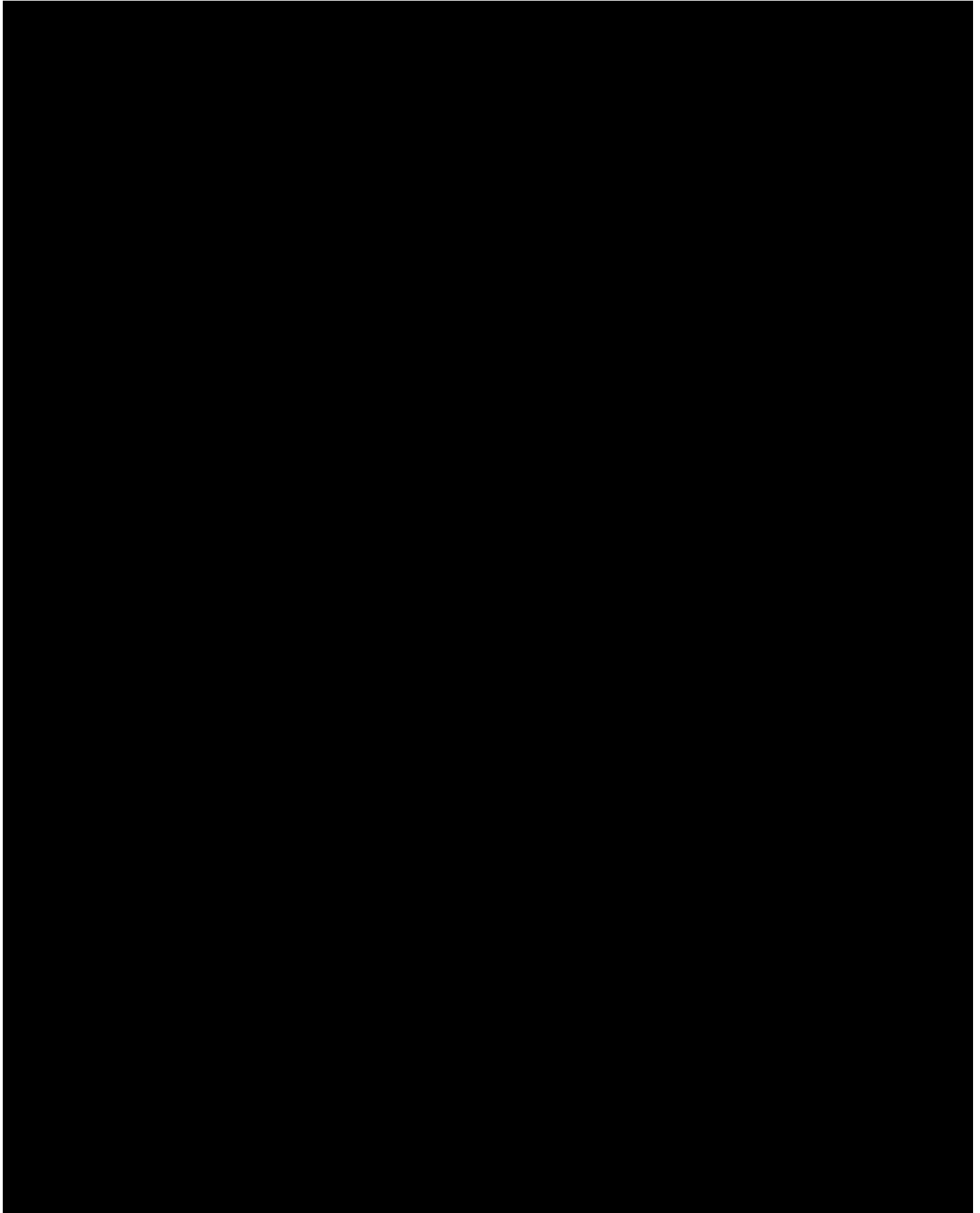
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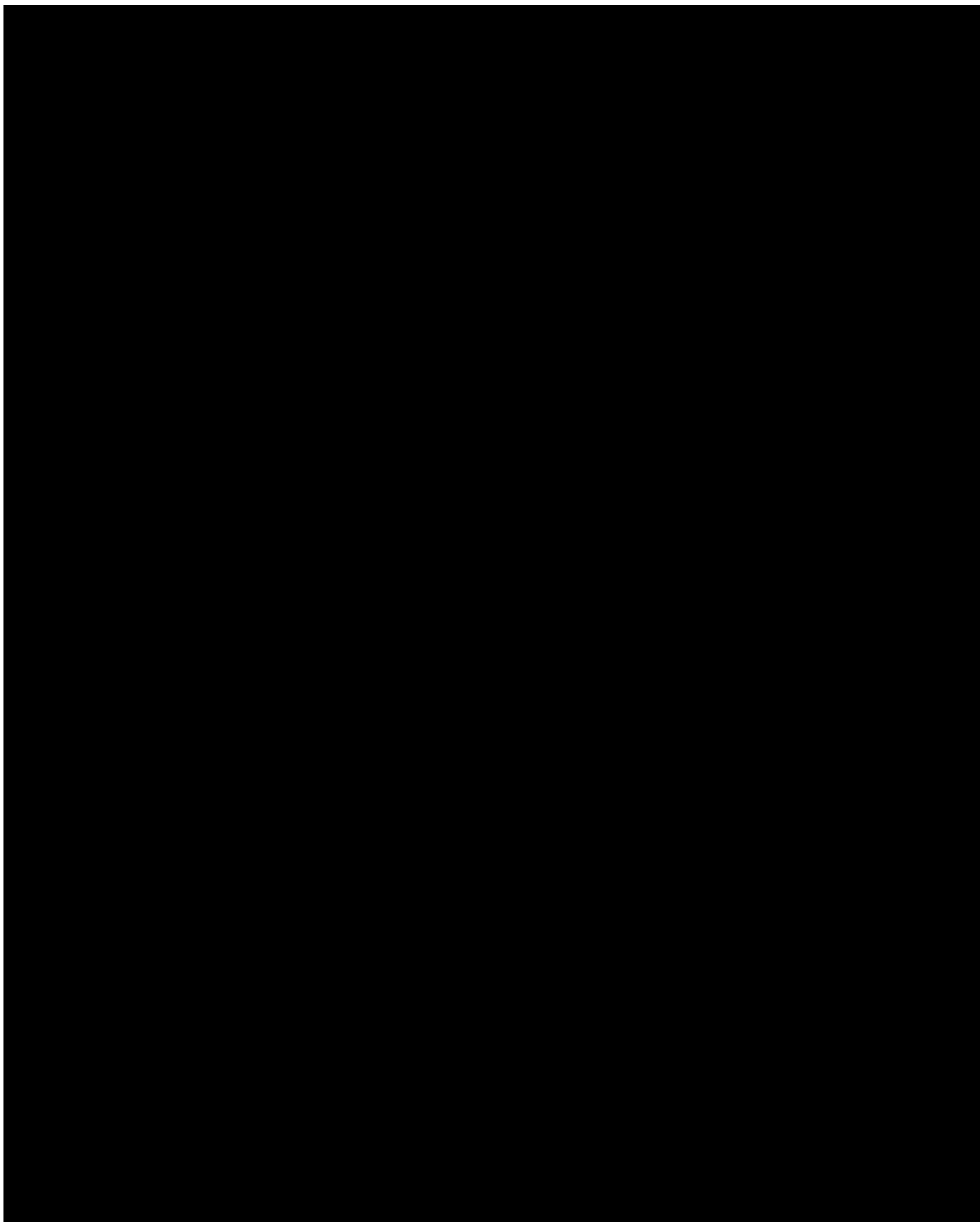
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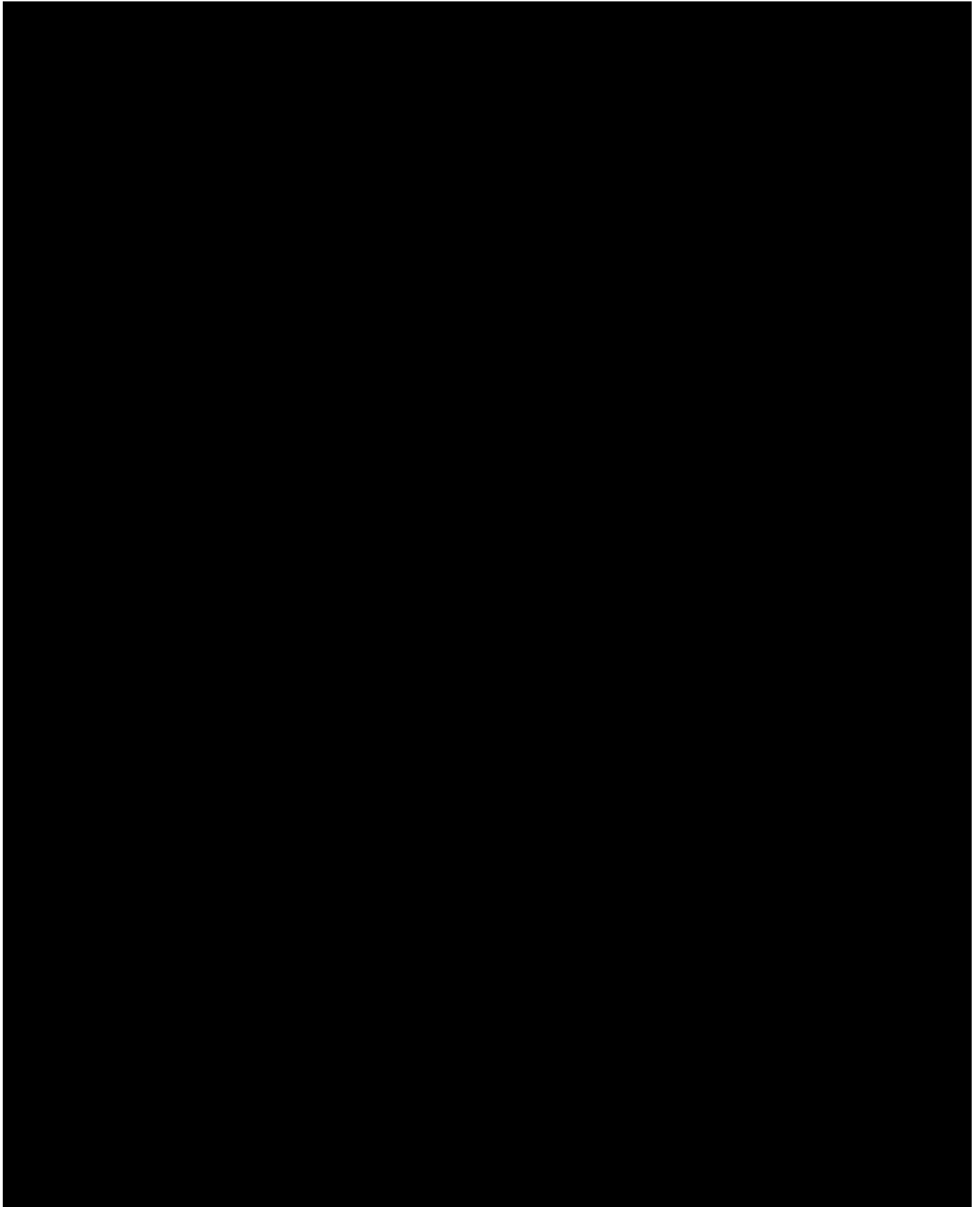
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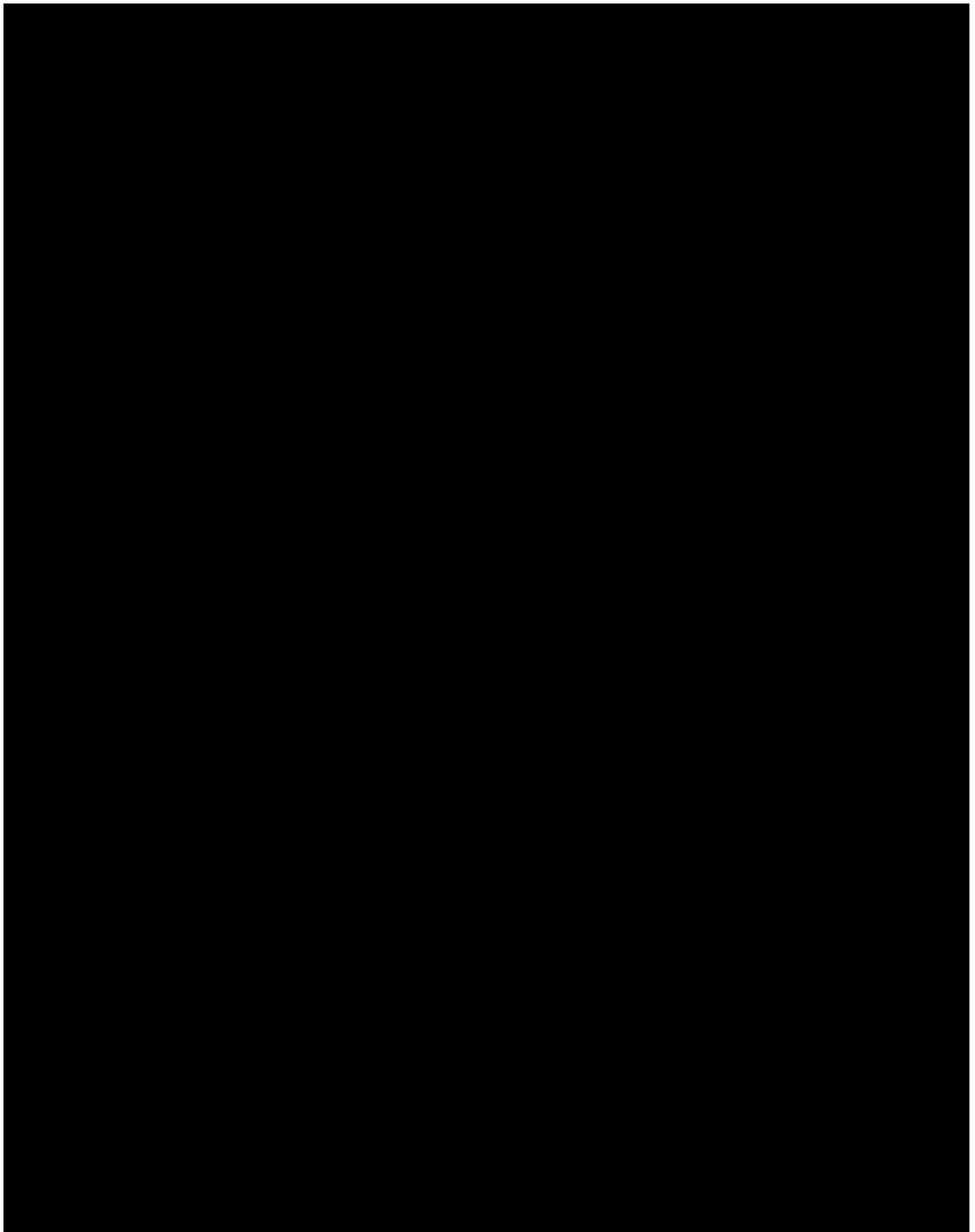
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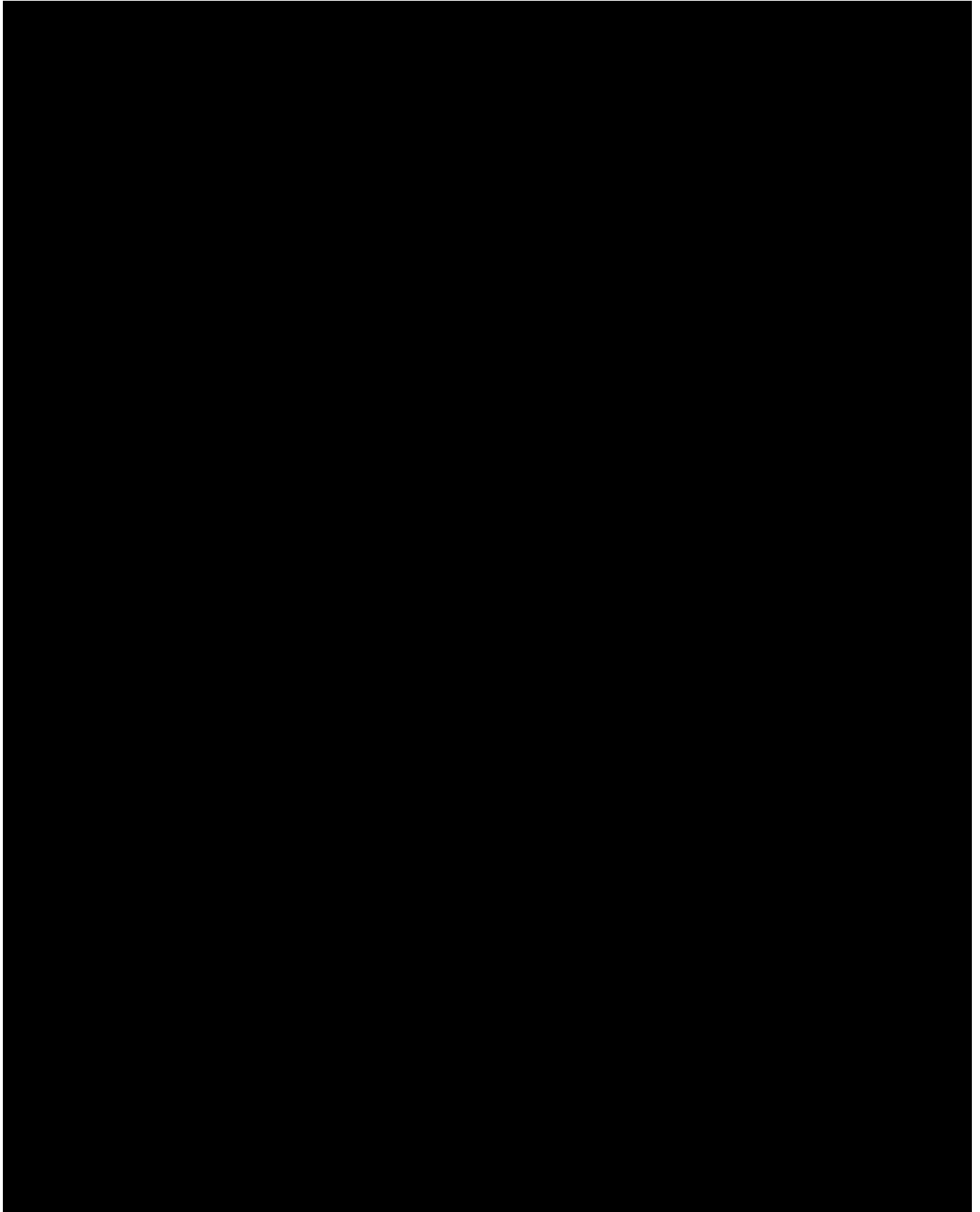
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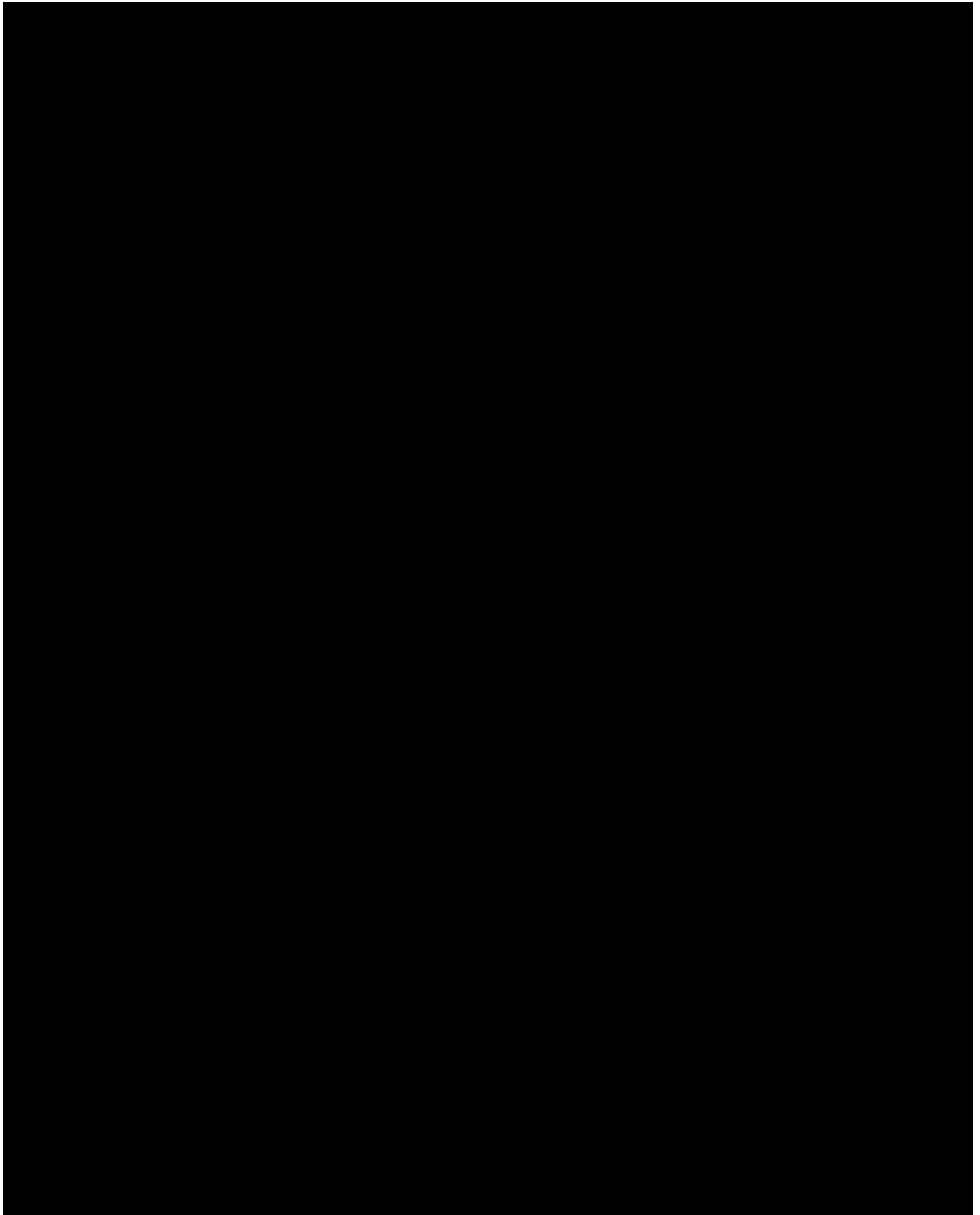
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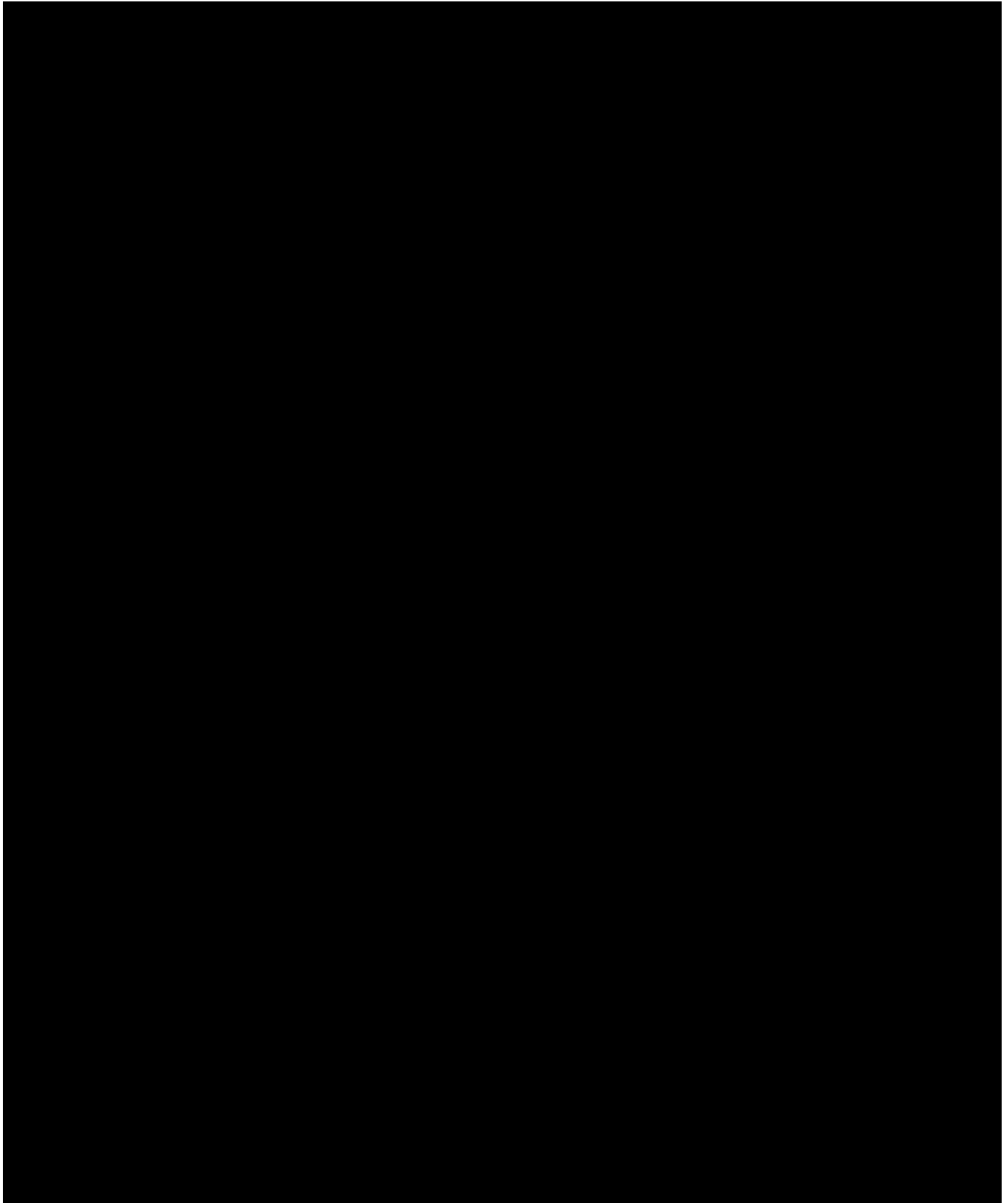
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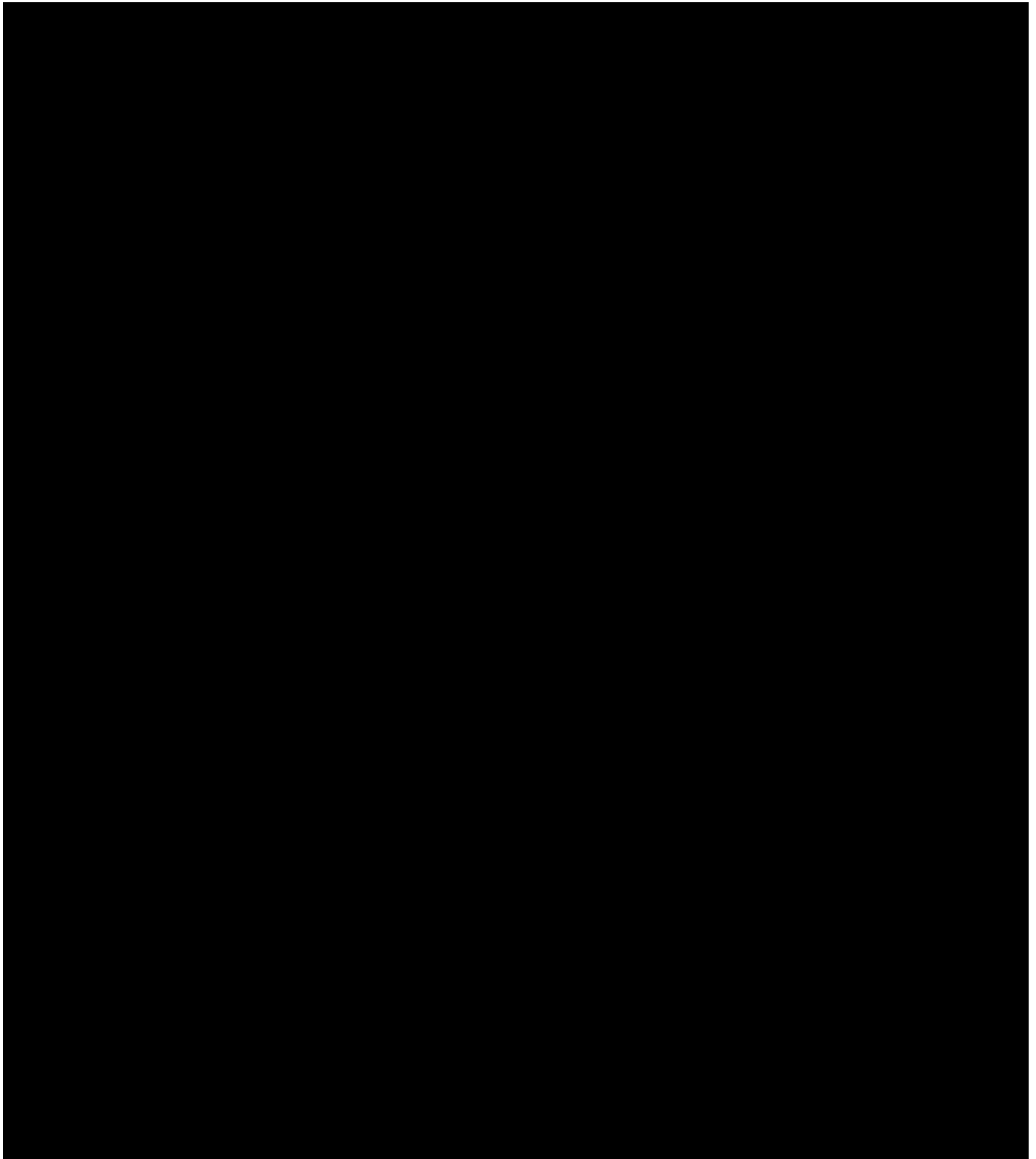
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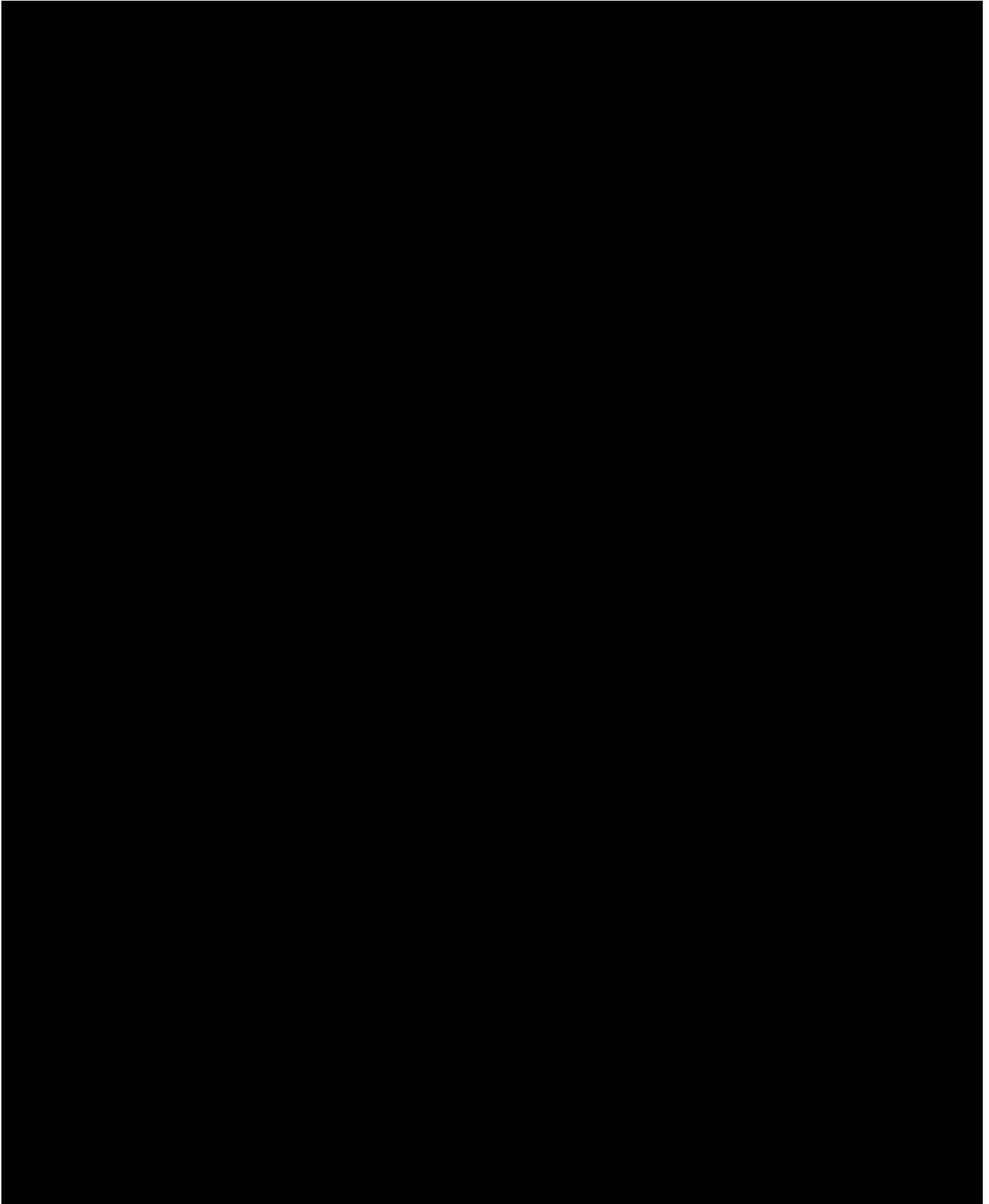
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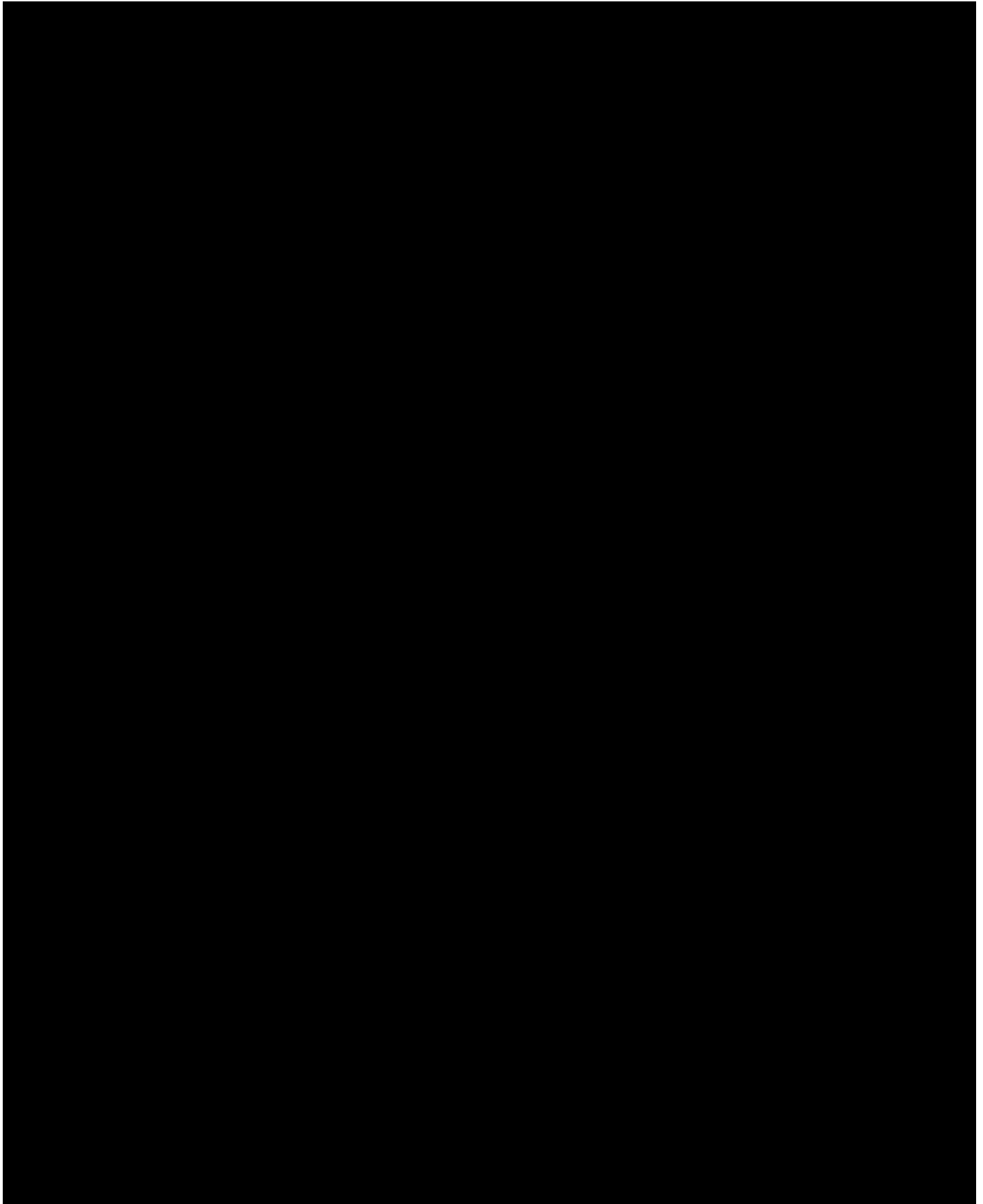
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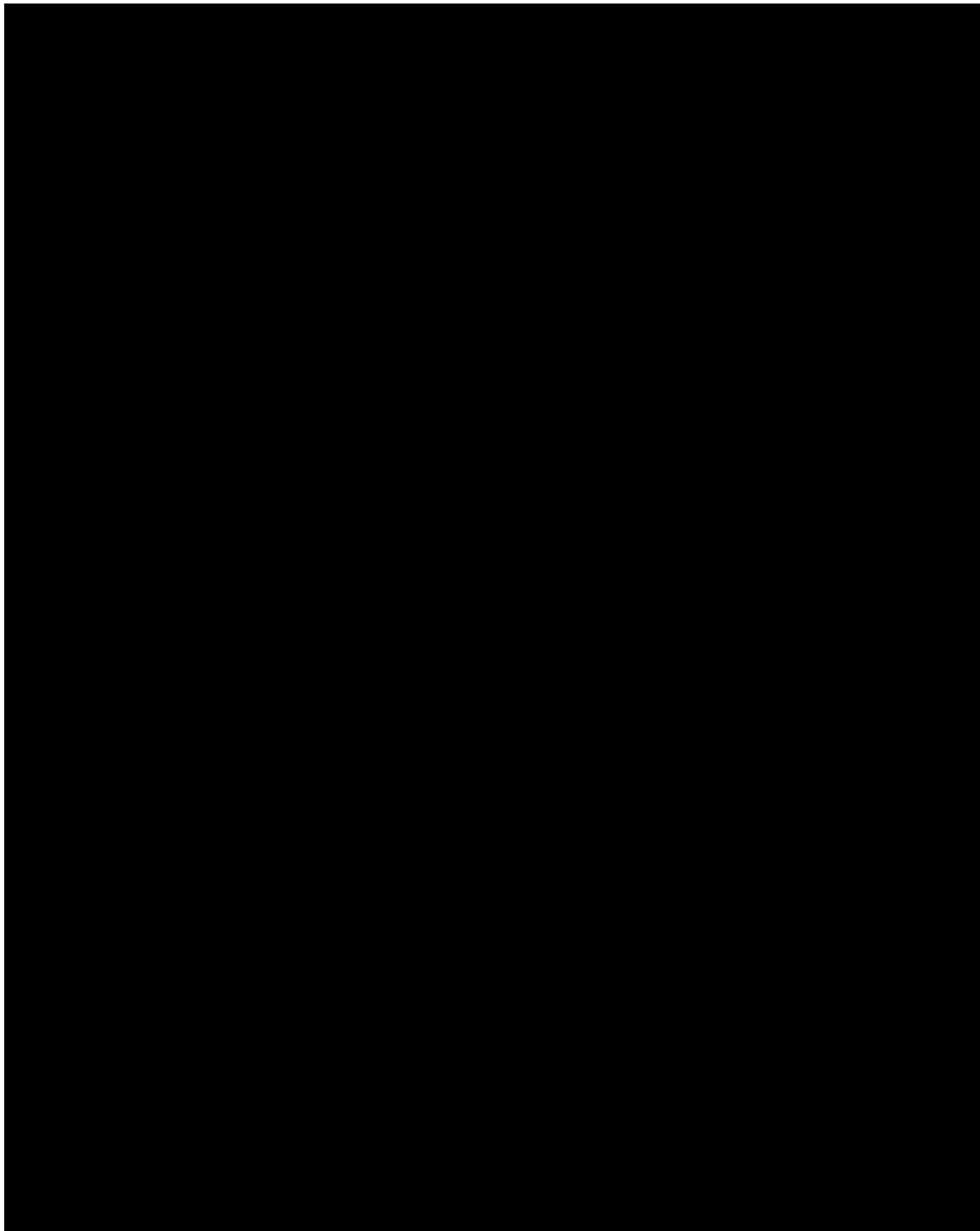
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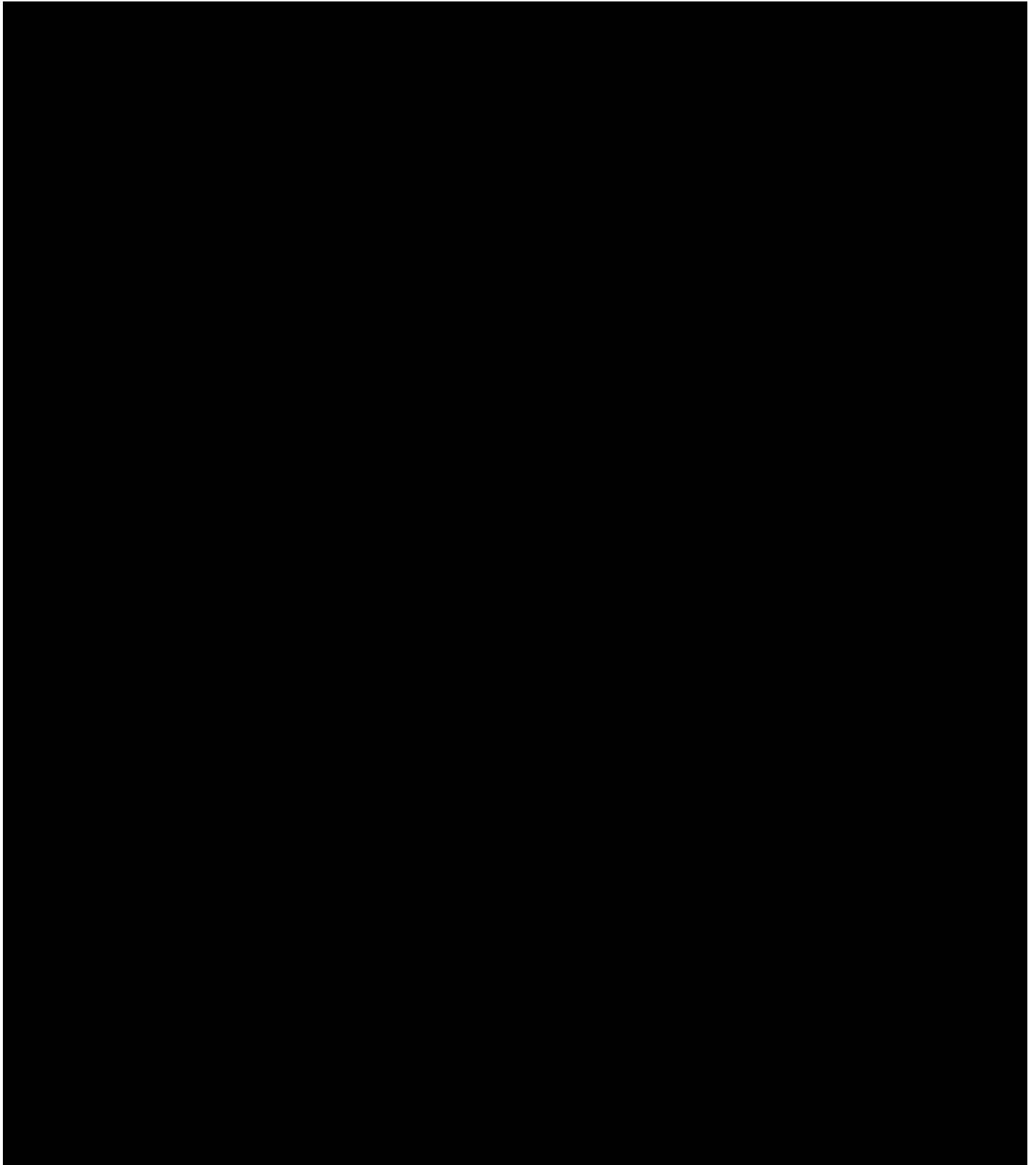
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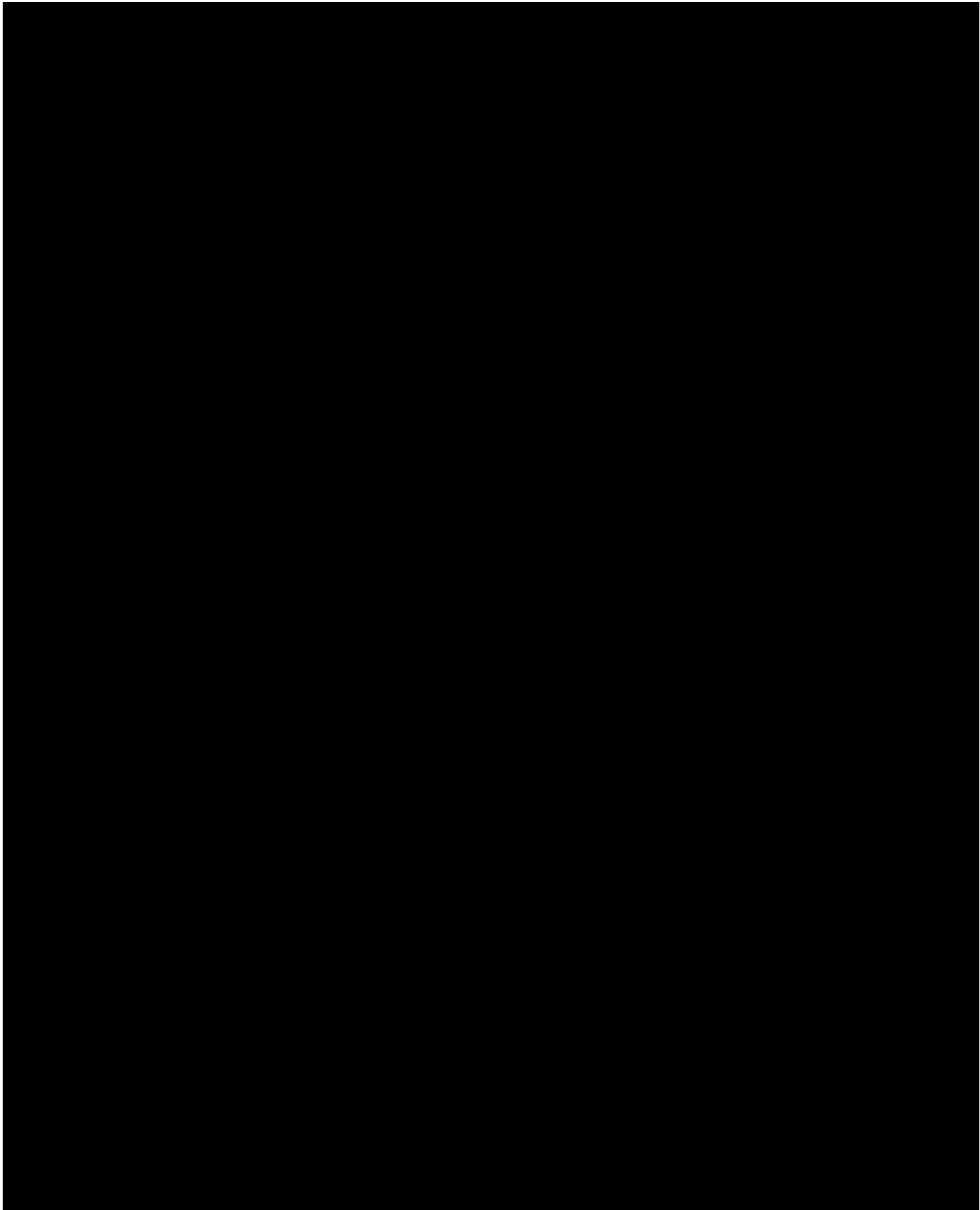
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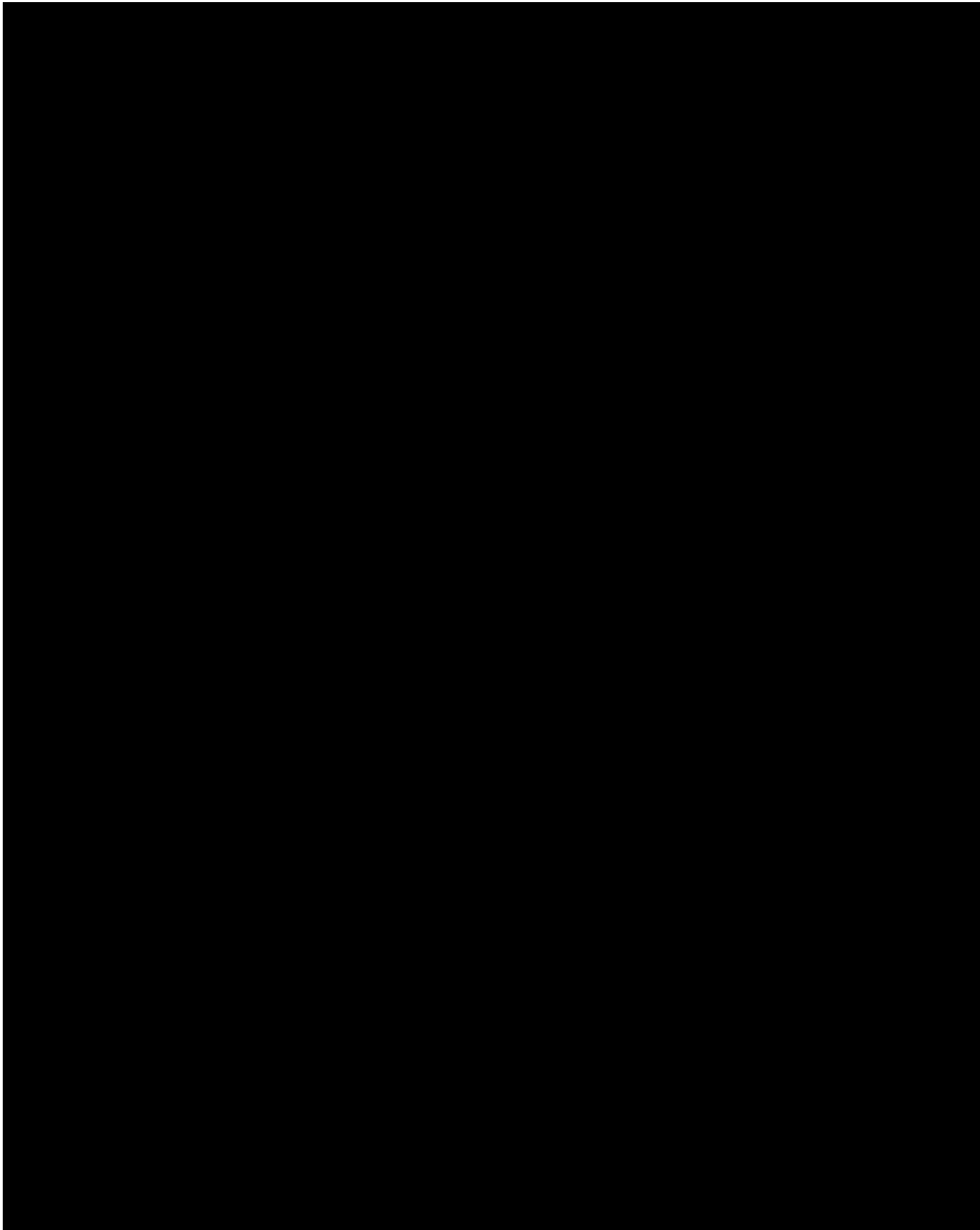
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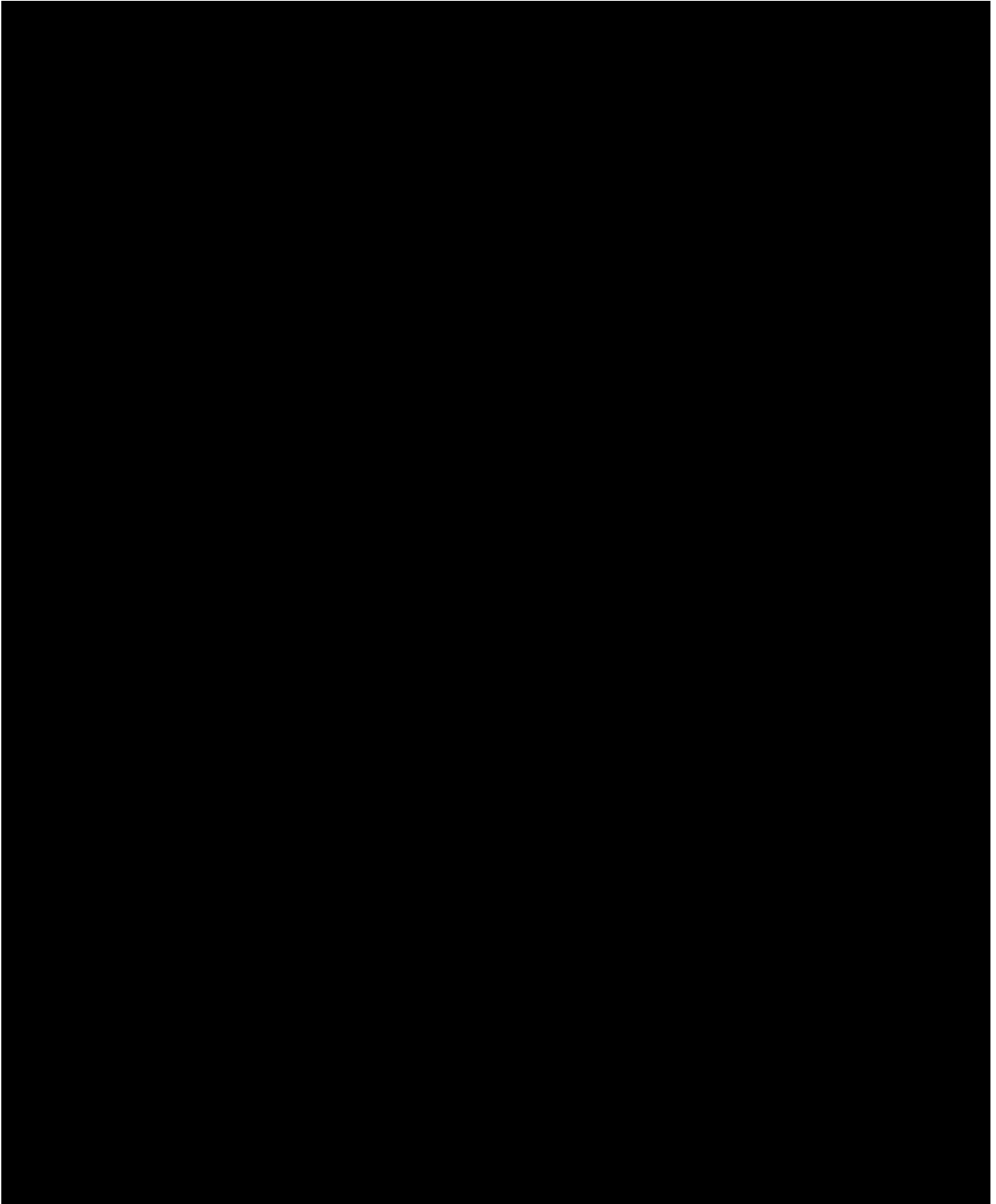
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