United States District Court Southern District of New York

Virginia L. Giuffre,	
Plaintiff,	Case No.: 15-cv-07433-RWS
v.	
Ghislaine Maxwell,	
Defendant	1

PLAINTIFF MS. GIUFFRE'S RESPONSE TO DEFENDANT'S MOTION TO EXCLUDE EVIDENCE PURSUANT TO FED. R. EVID. 404(B)

Sigrid McCawley BOIES SCHILLER FLEXNER LLP 401 E. Las Olas Blvd., Suite 1200 Ft. Lauderdale, FL 33301 (954) 356-0011

TABLE OF CONTENTS



TABLE OF AUTHORITIES

	<u>Page</u>
Cases	
Blind-Doan v. Sanders, 291 F.3d 1079 (9th Cir. 2002)	24
Dosier v. Miami Valley Broadcasting Corp., 656 F.2d 12954 (9th Cir. 1981)	17
Huddleston v U.S., 485 U.S. 681 (1988)	16
Ismail v. Cohen, 706 F. Supp. 243 (S.D.N.Y.1989)	20
Jane Does v. United States, No. 9:08-cv-80736-KAM (S.D. Fla. Dec. 30, 2014)	3
McMahon v. Valenzuela, 2015 WL 7573620, Case No. 2:14 CV-02085 CAS (C.D. Ca. Nov. 25, 2015)	23
Morris v. Eversley, 2004 WL 856301, No. 00 Civ. 8166 DC (S.D.N.Y. Apr. 20, 2004)	23
Perry v. Ethan Allen, Inc., 115 F.3d 143 (2d Cir.1997)	24
Roshan v. Fard, 705 F.2d 102 (4th Cir. 1983)	19
United States v. Abu-Jihaad, 630 F.3d 102 (2d Cir. 2010)	16
United States v. Barnason, 852 F. Supp. 2d 367 (S.D.N.Y. 2012)	22, 23
United States v. Carboni, 204 F.3d 39 (2d Cir.2000)	15, 21
United States v. Diaz, 176 F.3d 52 (2d Cir. 1999)	12, 18
United States v. Figueroa, 618 F.2d 934 (2d Cir. 1980)	24

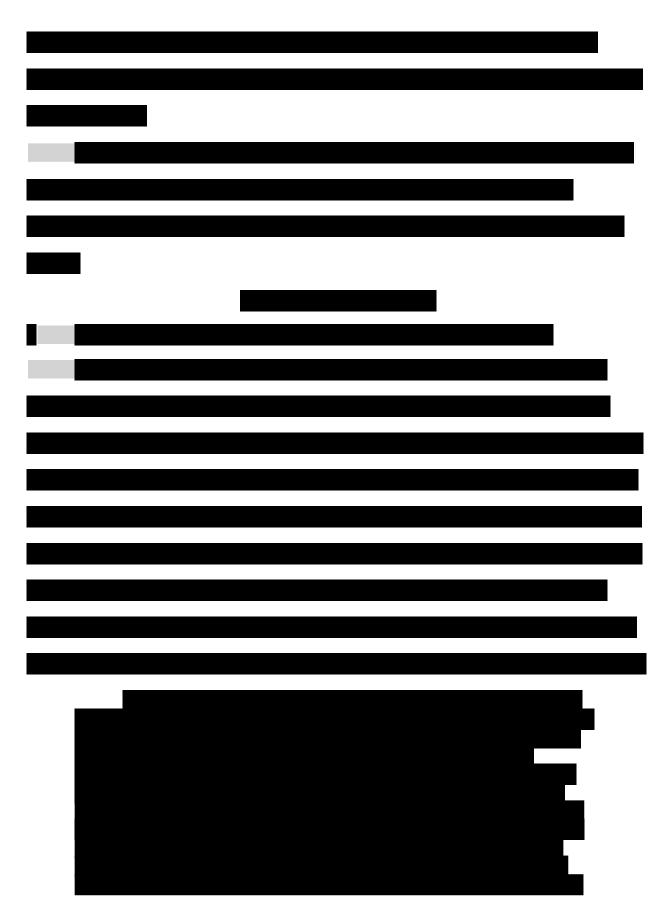
United States v. Gilan, 967 F.2d 776 (2d Cir.1992)	25
United States v. Hughes, 310 F.3d 557 (2002)	17
United States v. Jacobs, 44 F.3d 1219 (2d Cir. 1995)	19
United States v. Jobson, 102 F.3d 214 (6th Cir. 1996)	19, 20
United States v. Larson, 112 F.3d 600 (2d Cir. 1997)	22
United States v. Levy, 731 F.2d 997 (2d Cir. 1984)	17
United States v. Ozsusamlar, 428 F. Supp. 2d 161 (S.D.N.Y.2006)	24
United States v. Pipola, 83 F.3d 556 (2d Cir.1996)	17
United States v. Robinson, 702 F.3d 22 (2d Cir. 2012)	15, 25
United States v. Roldan–Zapata, 916 F.2d 795 (2d Cir.1990)	25
United States v. Rosa, 11 F.3d 315 (2d Cir.1993)	18
United States v. Senffner, 280 F.3d 755 (7th Cir. 2002)	19
United States v. Serang, 156 F.3d 910 (9th Cir. 1998)	20
United States v. Taylor, 92 F.3d 1313 (2d Cir.1996)	16
<u>Rules</u>	
Fed. R. Evid. 401	15
Fed. R. Evid. 402	15
Fed. R. Evid. 403	22. 24

Case 1:15-cv-07433-LAP Document 735 Filed 03/17/17 Page 6 of 33

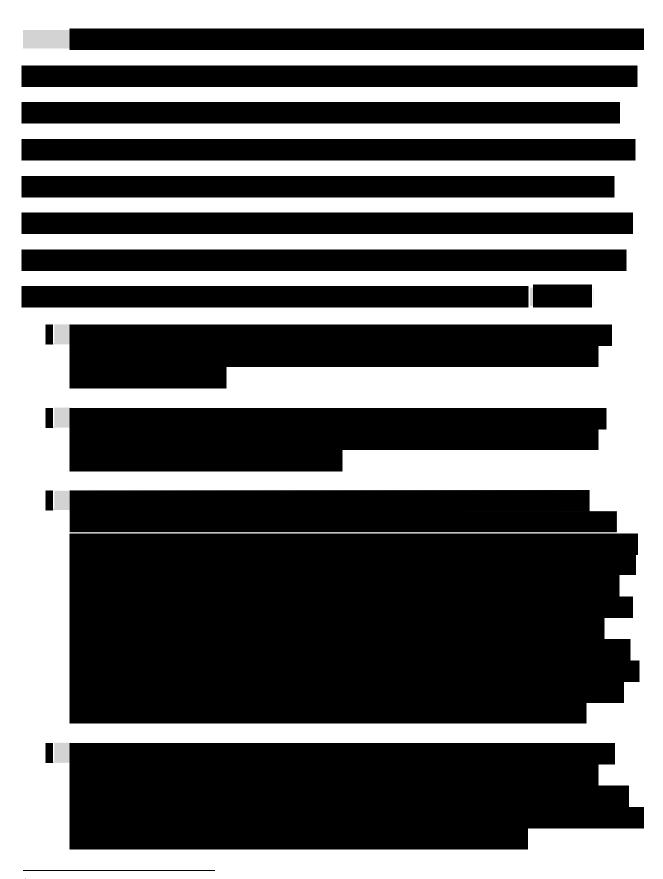
Fed. R. Evid. 404(b)	passim
Fed. R. Evid. 404(b)(1)	
Fed. R. Evid. 404(b)(2)	17
Fed. R. Evid. 413-415	22
Fed. R. Evid. 415	passim

Plaintiff, Ms. Virginia Giuffre, respectfully submits this memorandum of law in response and opposition to Defendant's Motion to Exclude Evidence Pursuant to Fed. R. Evid. 404(b).

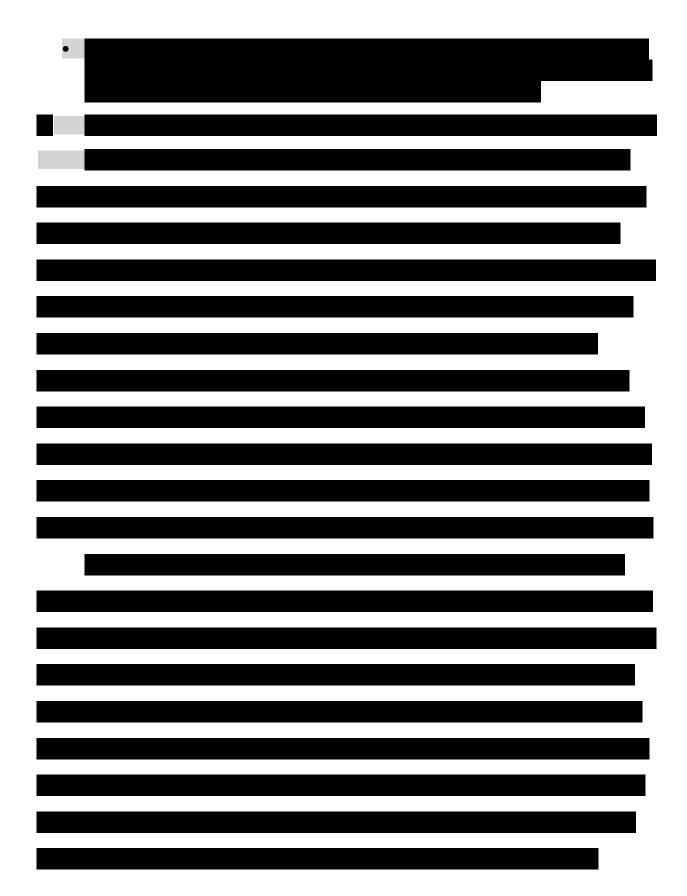


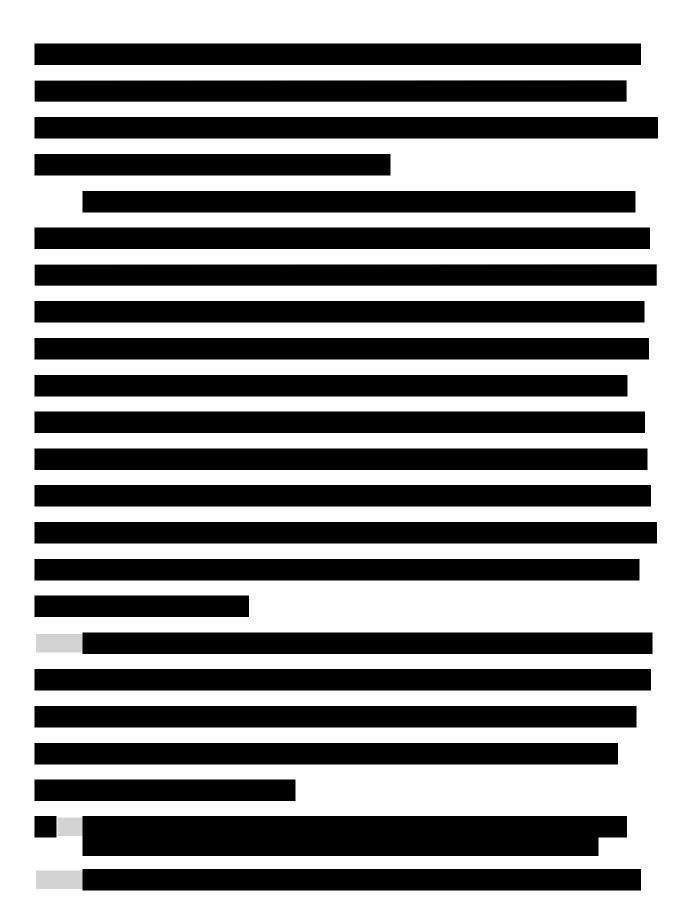


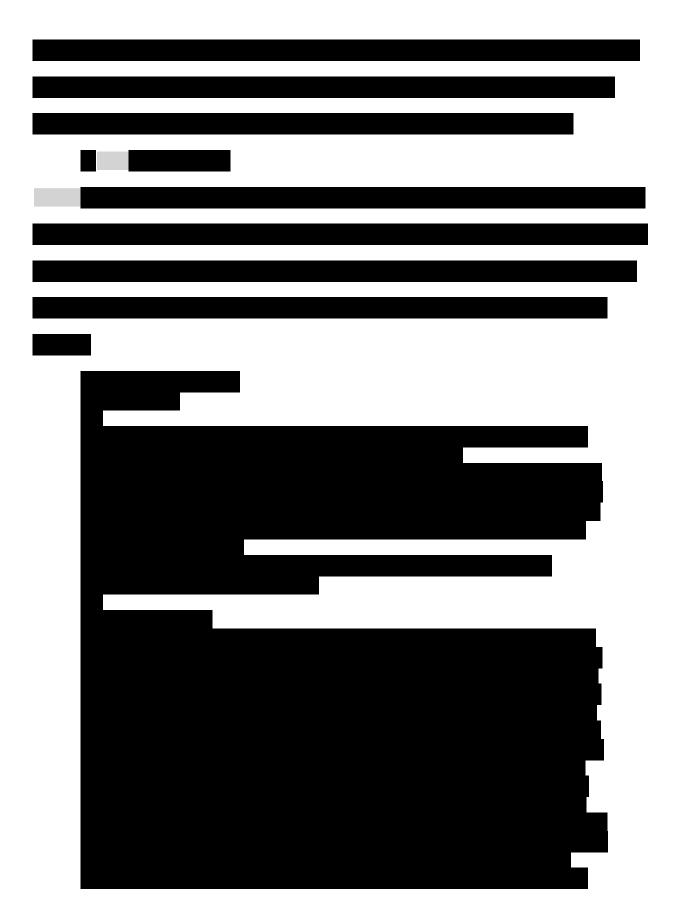


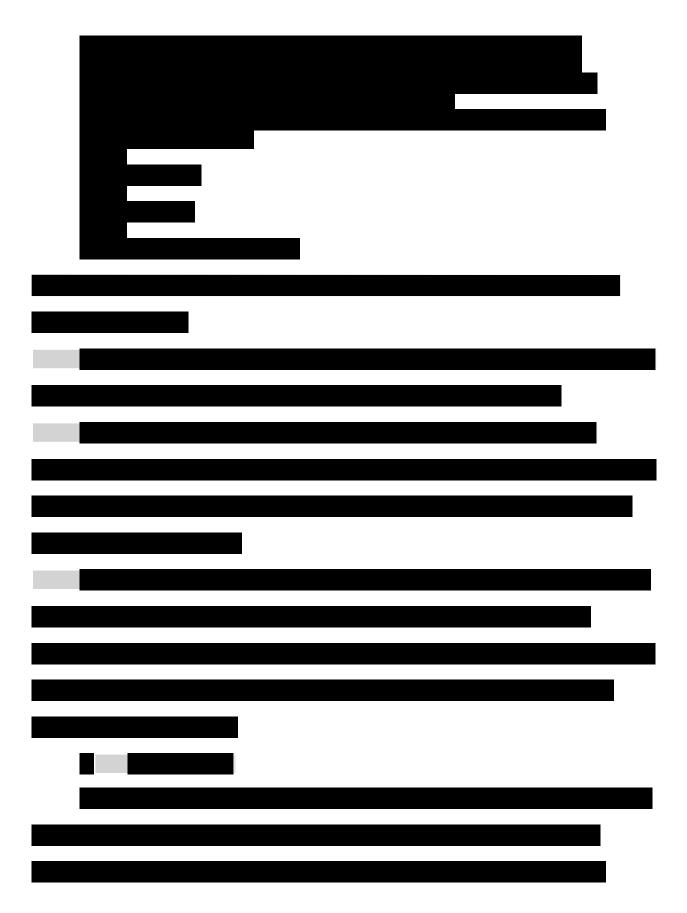


¹ Each of the bullet points below represent a different witness who will testify.





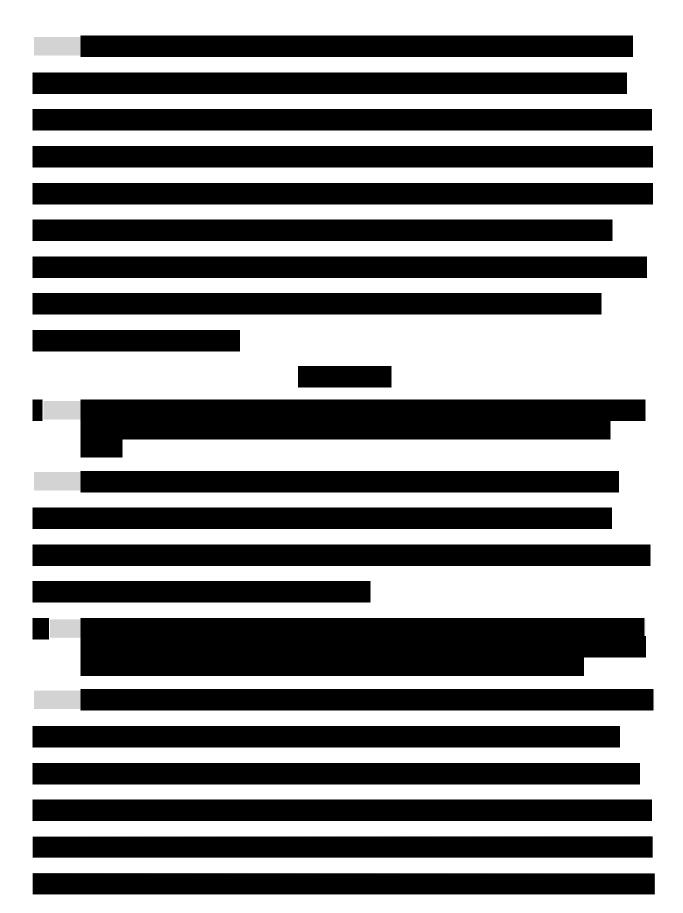


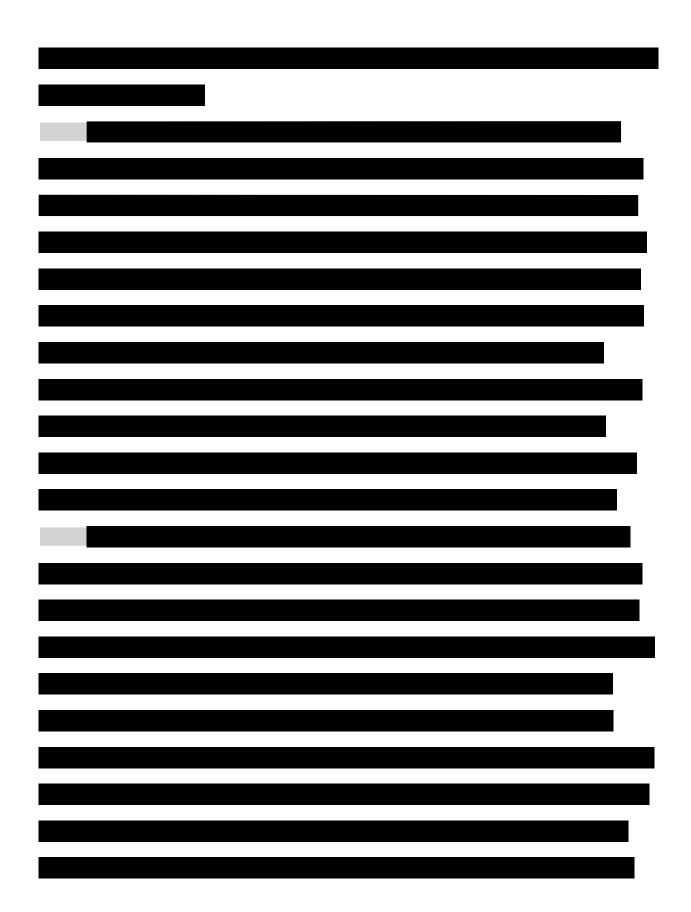


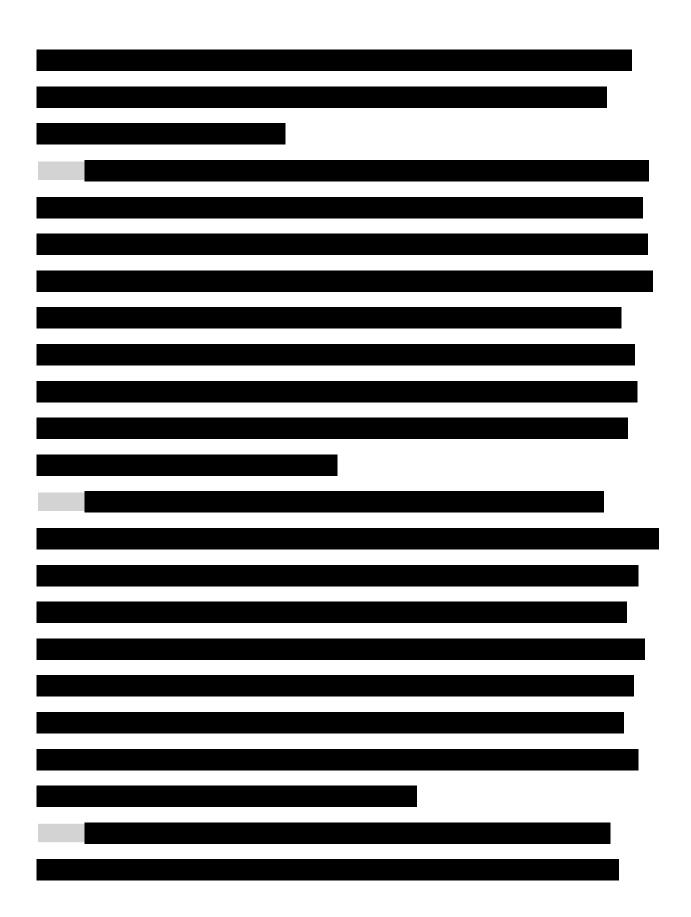


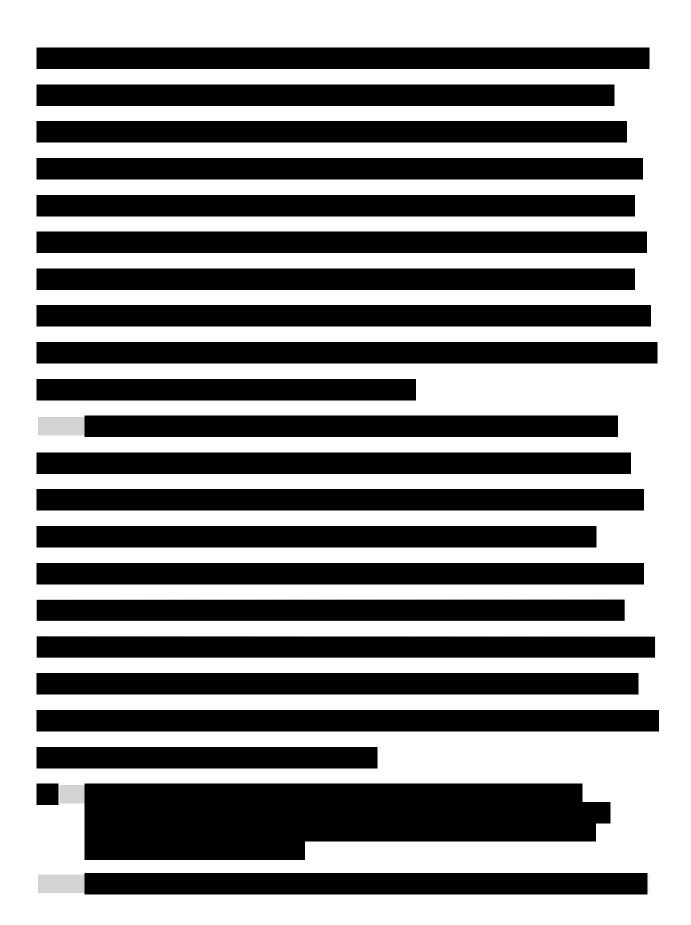






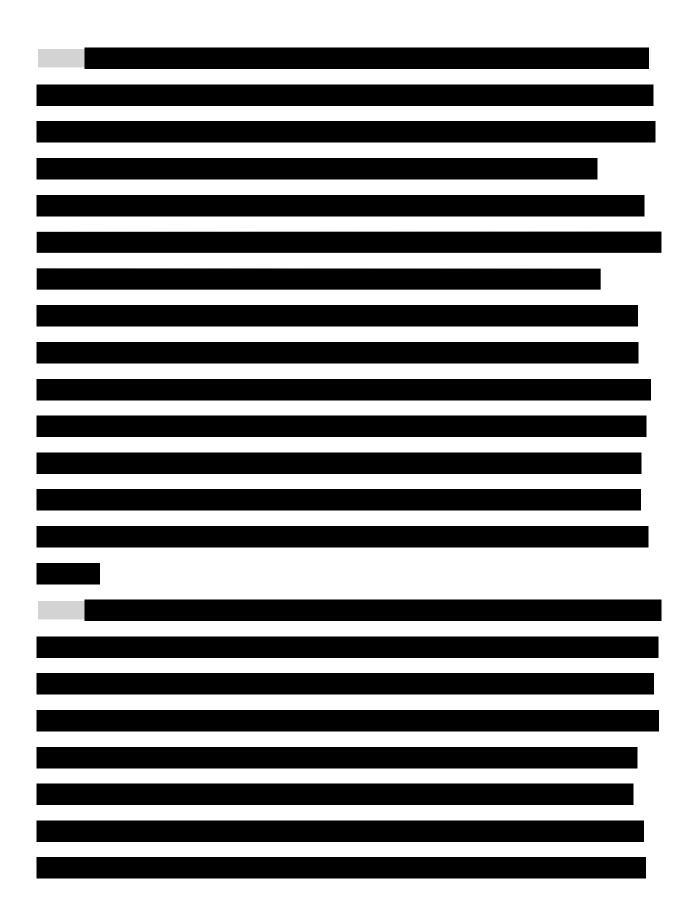






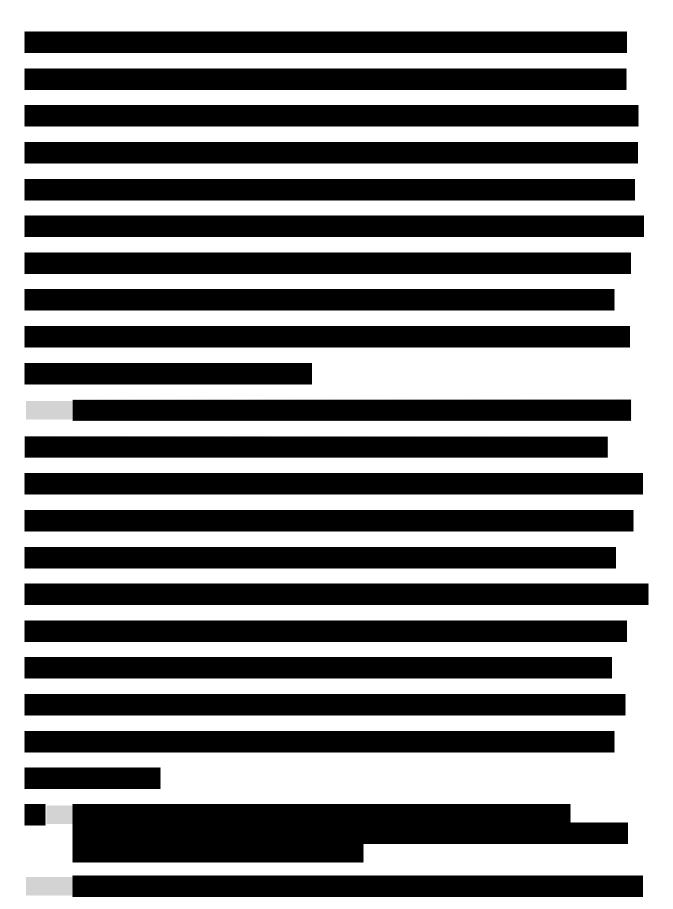


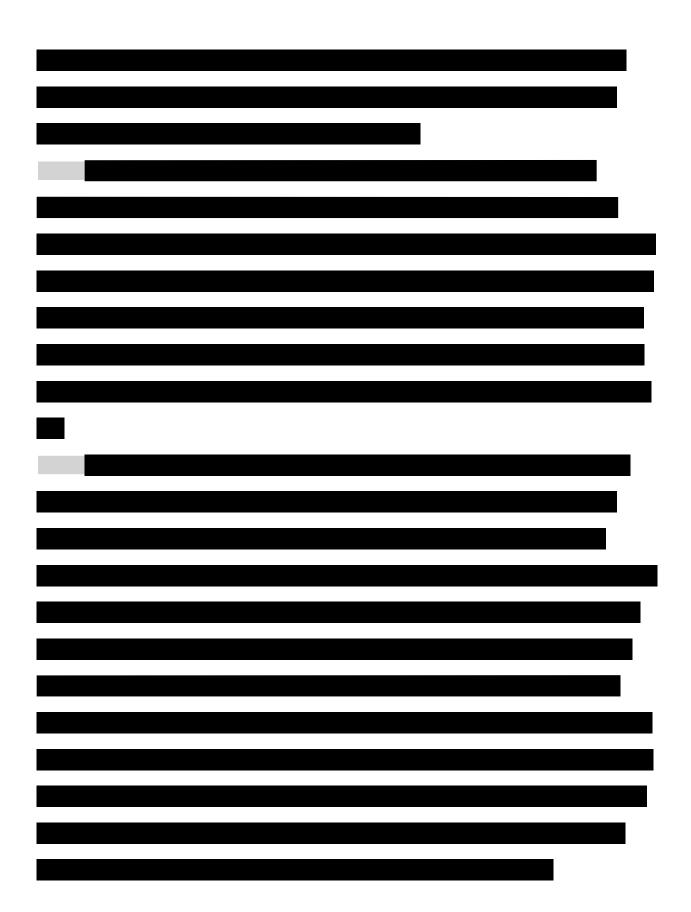


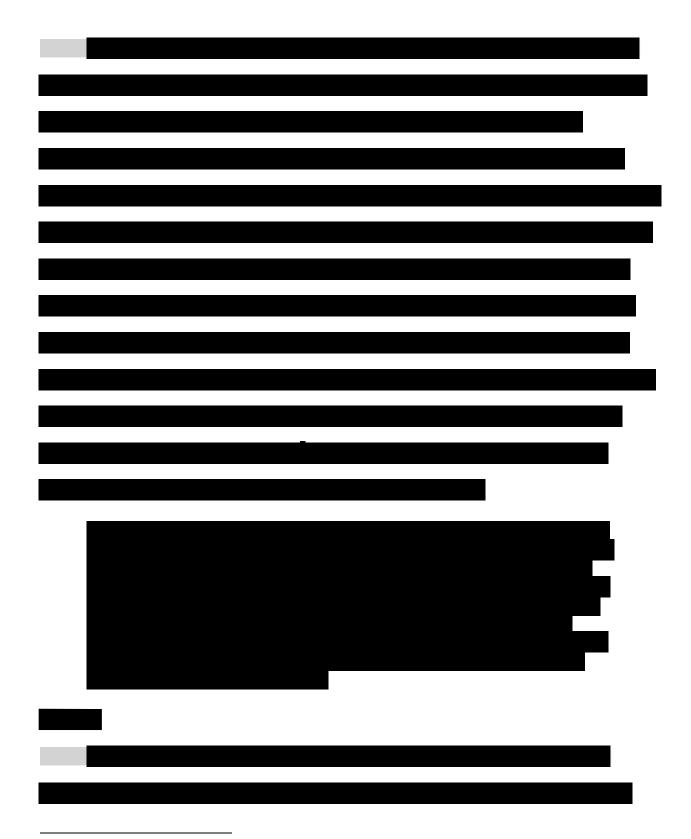




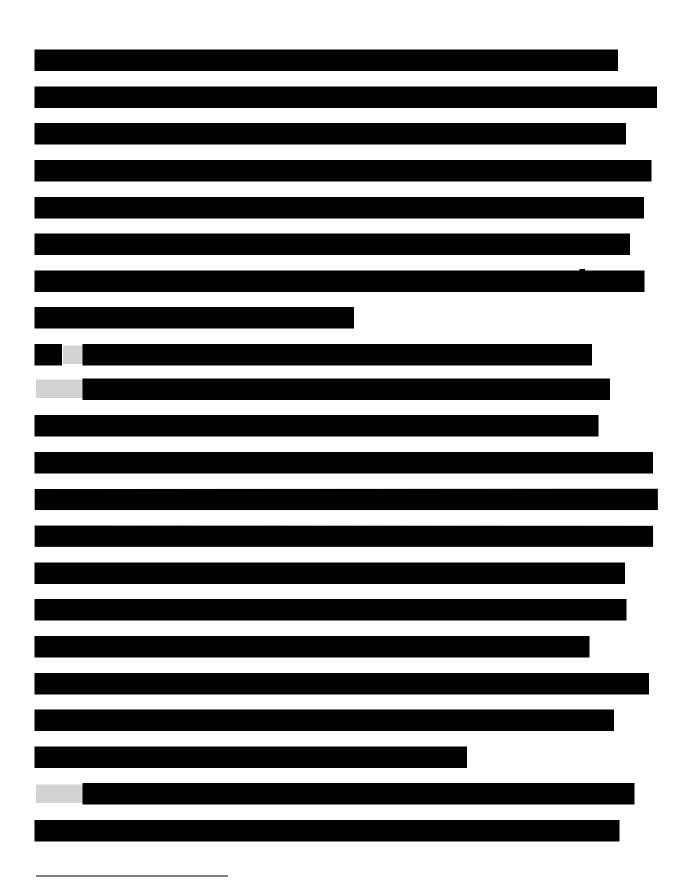








² The only evidence this Court excluded was evidence of Barnason's prior conviction that dealt with vastly different facts including his assault of a young child that came to meet Barnason's daughter to trade stickers and another incident where he played "doctor" with his daughter's young friends. *Id.* at 376. This Court excluded that evidence because the assaults were vastly different than the assaults on the tenants in the building. *Id.* at 377.



³ Of course, other reasons may develop at trial for the admissibility of this evidence, but the Court can make a pretrial ruling based upon applicable law that applies at this stage of proceedings.



CONCLUSION

For all of the foregoing reasons, Ms. Giuffre respectfully requests that the Court deny Defendant's motion in limine and permit her to introduce all evidence concerning Defendant's participation in her and Epstein's sexual abuse of females, and all evidence concerning Defendant's participation and role in her and Epstein's sex trafficking organization.

Dated: March 17, 2017 Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 17, 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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