

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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

15-cv-07433-RWS

**Defendant's Surreply in Opposition to "Motion to Compel"
Work Product and Attorney-Client Communications with Philip Barden**

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REDACTED

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CONCLUSION

The Court should deny the motion to compel, and award sanctions.

Dated: March 17, 2017

Respectfully submitted,

/s/ Ty Gee

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CERTIFICATE OF SERVICE

I certify that on March 17, 2017, I electronically served this *Defendant's Surreply in Opposition to "Motion to Compel" Work Product and Attorney-Client Communications with Philip Barden* via ECF on the following:

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