

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VIRGINIA L. GIUFFRE,

Plaintiff

Case No. 15-cv-07433-RWS

vs.

GHISLAINE MAXWELL,

Defendant

_____ /

**NON-PARTY JEFFREY EPSTEIN'S RESPONSE IN OPPOSITION TO MOTION TO
COMPEL TESTIMONY OF JEFFREY EPSTEIN**

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TABLE OF CONTENTS

INTRODUCTION	1
I. BACKGROUND	2
■ [REDACTED]	4
■ [REDACTED]	8
■ [REDACTED]	9
■ [REDACTED]	13
CONCLUSION	16
CERTIFICATE OF SERVICE	17

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Plaintiff

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COMPEL TESTIMONY OF JEFFREY EPSTEIN**

Non-party Jeffrey Epstein, by and through undersigned counsel, hereby files this Response in Opposition to defendant Ghislaine Maxwell's Motion to Compel Testimony of Jeffrey Epstein. Defendant's Motion to Compel should be denied in its entirety. [REDACTED]

[illegible]

Table 1 Summary of the study design and participant characteristics

[illegible][illegible]

1. The first step in the process is to identify the problem or issue that needs to be addressed. This involves gathering information and understanding the context of the problem.

Figure 1. The effect of the number of iterations on the accuracy of the proposed algorithm. The accuracy of the proposed algorithm is plotted against the number of iterations. The accuracy increases rapidly in the first 10 iterations and then levels off. The accuracy is approximately 0.95 after 10 iterations and remains stable thereafter.

[illegible][illegible]

Table 1. *Continued*

[illegible]

1. The first step in the process is to identify the problem or issue that needs to be addressed. This involves gathering information and understanding the context of the problem.

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[illegible]

1. The first step is to identify the problem. This involves understanding the current situation and what needs to be improved.

2. The second step is to set goals. These should be specific, measurable, achievable, relevant, and time-bound (SMART).

3. The third step is to develop a plan. This involves identifying the resources needed and the steps to be taken.

4. The fourth step is to implement the plan. This involves putting the plan into action and monitoring progress.

5. The fifth step is to evaluate the results. This involves comparing the actual results with the goals and identifying areas for improvement.

6. The sixth step is to make adjustments. This involves making changes to the plan or implementation based on the evaluation.

7. The seventh step is to communicate the results. This involves sharing the findings with the relevant stakeholders.

8. The eighth step is to document the process. This involves keeping records of the steps taken and the results achieved.

9. The ninth step is to review the process. This involves reflecting on the experience and identifying lessons learned.

10. The tenth step is to repeat the process. This involves applying the lessons learned to future projects.

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CONCLUSION

For all the foregoing reasons, Defendant's motion to compel should be denied in its entirety. [REDACTED]

[REDACTED]

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on all counsel of record by CM/ECF on October 17, 2016.

Respectfully submitted,
JEFFREY EPSTEIN
By his attorneys,

/s/ Jack A. Goldberger
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