UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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

Response to Plaintiff's Motion to Present Testimony From Sarah Kellen and Nadia Marcinkova for Purposes of Obtaining an Adverse Inference Instruction

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

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CONCLUSION

For the foregoing reasons, Ms. Maxwell requests that the Court exclude from trial the testimony of Sarah Kellen and Nadia Marcinkova, or any witness invoking their Fifth Amendment Privilege, through deposition or otherwise.

Dated: March 17, 2017

Respectfully submitted,

/s/ Laura A. Menninger

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CERTIFICATE OF SERVICE

I certify that on March 17, 2017, I electronically served this *Response to Plaintiff's Motion to Present Testimony from Sarah Kellen And Nadia Marcinkova For Purposes of Obtaining an Adverse Inference Instruction* via ECF on the following:

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