UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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

DEFENDANT'S MOTION IN LIMINE TO EXCLUDE EXPERT TESTIMONY AND OPINION OF DIANNE C. FLORES

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I. THE "DISPUTED DOCUMENTS" ARE UNAUTHENTICATED, LACK ANY EVIDENTIARY FOUNDATION, HEARSAY, AND NOT RELEVANT
II. THE TESTIMONY IS INADMISSIBLE UNDER RULE 702 OF THE FEDERAL RULES OF EVIDENCE
A. Handwriting Analysis Lacks Any Scientific Basis, Precluding Admission Of "Expert" Testimony
B. Lack of Testing and Lack of Error Rates
C. A Lack of Standards Creates Conclusions That Are Always Subjective
D. Handwriting Analysis Lacks Peer Review and Lacks Acceptance by Neutral, Financially Disinterested Community
E. One-on-One Handwriting Comparisons Are Unduly Suggestive
CONCLUSION
CERTIFICATE OF SERVICE

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Dated: January 5, 2017

Respectfully submitted,

/s/ Jeffrey S. Pagliuca

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CERTIFICATE OF SERVICE

I certify that on January 5, 2017, I electronically served this *Defendant's Motion in Limine to Exclude Expert Testimony and Opinion of Dianne C. Flores* via ECF on the following:

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