# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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

Defendant's Combined Motion To Compel Non-Party Witness To Produce Documents and Respond To Deposition Questions, And Response to Motion for Protective Order for Non-Party Witness

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

# TABLE OF CONTENTS

and

**PAGES 1-15** 

**REDACTED** 

Dated: March 2, 2017

## Respectfully submitted,

## /s/ Laura A. Menninger

Laura A. Menninger (LM-1374)
Jeffrey S. Pagliuca (pro hac vice)
Ty Gee (pro hac vice)
HADDON, MORGAN AND FOREMAN, P.C.
150 East 10<sup>th</sup> Avenue
Denver, CO 80203

Phone: 303.831.7364 Fax: 303.832.2628 Imenninger@hmflaw.com

Attorneys for Ghislaine Maxwell

### **CERTIFICATE OF SERVICE**

I certify that on March 2, 2017, I electronically served this *Defendant's Motion to Compel Non-Party Witness to Produce Documents, Respond to Deposition Questions, and Response to Motion for Protective Order* via ECF on the following:

Sigrid S. McCawley
Meredith Schultz
BOIES, SCHILLER & FLEXNER, LLP
401 East Las Olas Boulevard, Ste. 1200
Ft. Lauderdale, FL 33301
smccawley@bsfllp.com
mschultz@bsfllp.com

383 S. University Street Salt Lake City, UT 84112 cassellp@law.utah.edu

Paul G. Cassell

Bradley J. Edwards FARMER, JAFFE, WEISSING, EDWARDS, FISTOS & LEHRMAN, P.L. 425 North Andrews Ave., Ste. 2 Ft. Lauderdale, FL 33301 brad@pathtojustice.com J. Stanley Pottinger 49 Twin Lakes Rd. South Salem, NY 10590 StanPottinger@aol.com

/s/ Nicole Simmons

Nicole Simmons