

United States District Court  
Southern District of New York

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

**PLAINTIFF'S MOTION TO COMPEL THE PRODUCTION OF DOCUMENTS  
SUBJECT TO IMPROPER OBJECTION AND IMPROPER CLAIM OF PRIVILEGE**

Plaintiff Virginia Giuffre, by and through her undersigned counsel, respectfully submits  
this Motion to Compel Production of Documents [REDACTED]

[REDACTED] For the reasons set forth below, this Court should grant Plaintiff's  
Motion in its entirety.

**I. FACTUAL BACKGROUND<sup>1</sup>**

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II. LEGAL ARGUMENT

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A horizontal bar chart consisting of 20 solid black bars. The bars are arranged vertically, with their lengths varying significantly. The longest bar is the 10th bar from the top, extending almost to the right edge of the image. The bars at the top and bottom are the shortest, while the bars in the middle are longer, creating a roughly bell-shaped distribution of lengths.

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Bar Index	Bar Color	Approximate Length (0-100)
1	Black	95
2	Black	98
3	Black	92
4	Black	100
5	Black	95
6	Black	92
7	Black	10
8	Light Gray	85
9	Black	98
10	Black	100
11	Black	95
12	Black	75
13	Black	90
14	Black	85
15	Black	95
16	Black	98
17	Black	92
18	Black	100
19	Black	55
20	Black	95

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Dated: August 9, 2016

Respectfully Submitted,  
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<sup>6</sup> This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah for this private representation.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on the 9th day of August, 2016, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I also certify that the foregoing document is being served this day on the individuals identified below via transmission of Notices of Electronic Filing generated by CM/ECF.

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