#### **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 REPLY IN SUPPORT OF MOTION TO COMPEL ALL WORK PRODUCT AND ATTORNEY-CLIENT COMMUNICATIONS WITH PHILIP BARDEN

Sigrid McCawley BOIES, SCHILLER & FLEXNER LLP 401 E. Las Olas Blvd., Suite 1200 Ft. Lauderdale, FL 33301 (954) 356-0011

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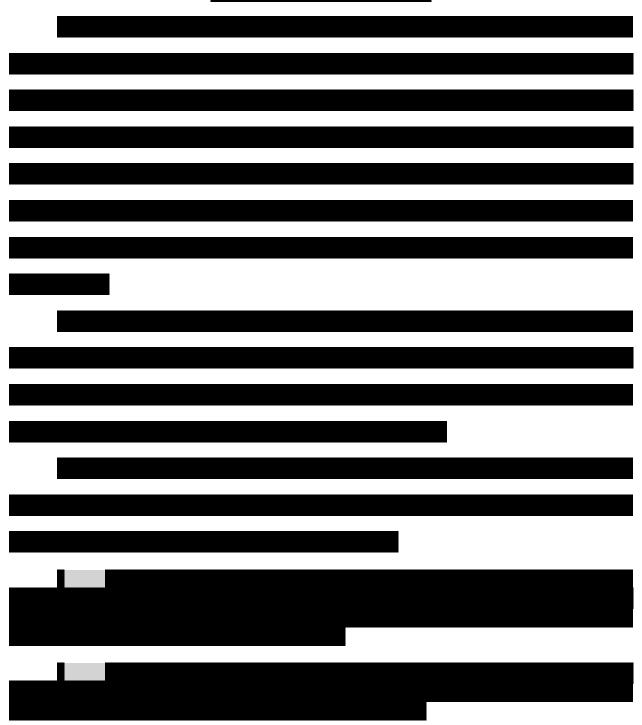
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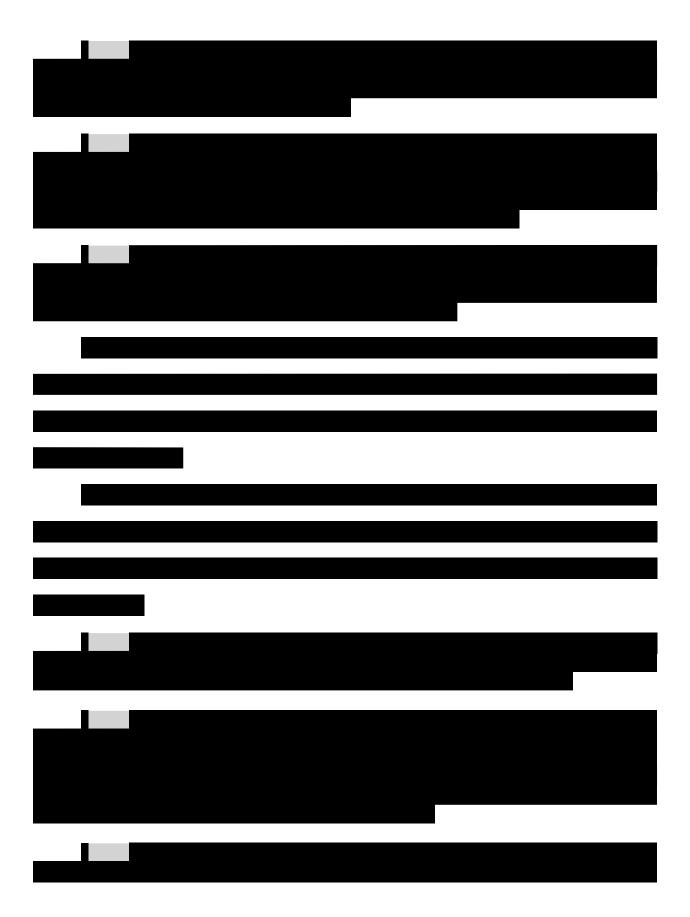
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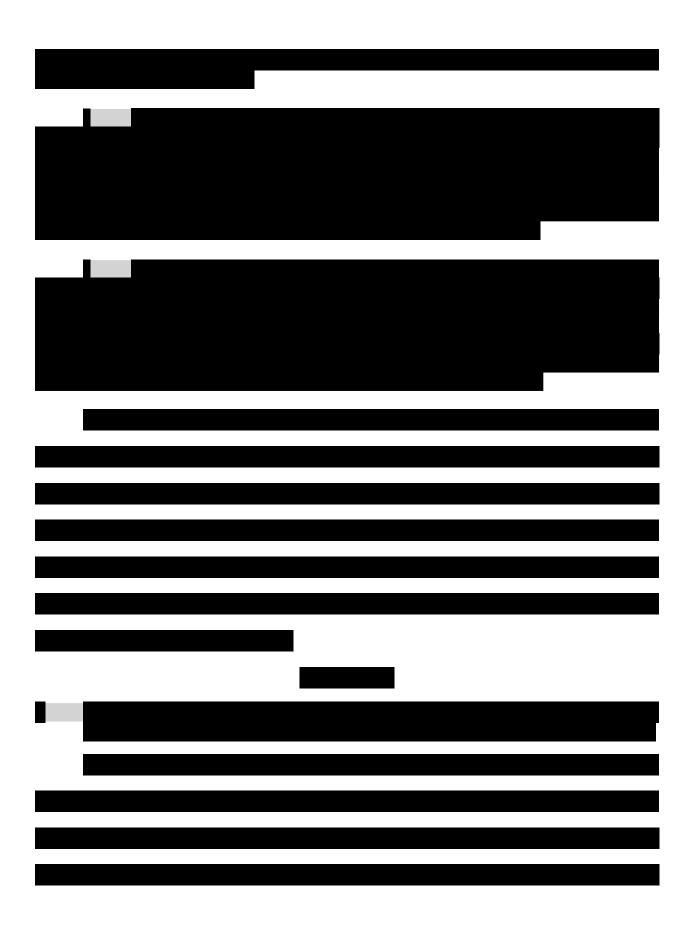
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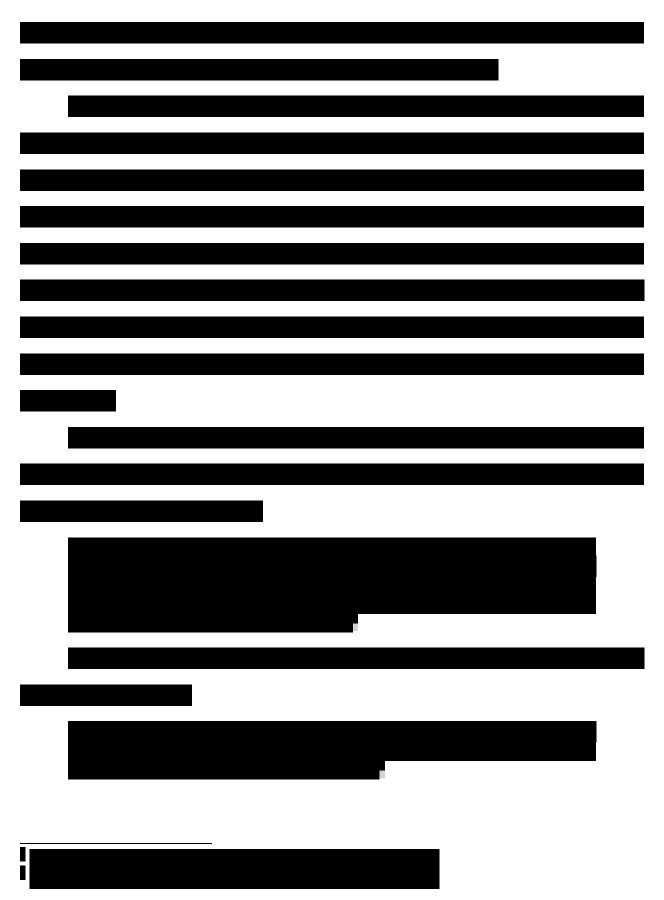
Plaintiff, Virginia Giuffre, hereby files this Reply in Support of her Motion to Compel Work Product and Attorney Client Communications with Philip Barden and states as follows.

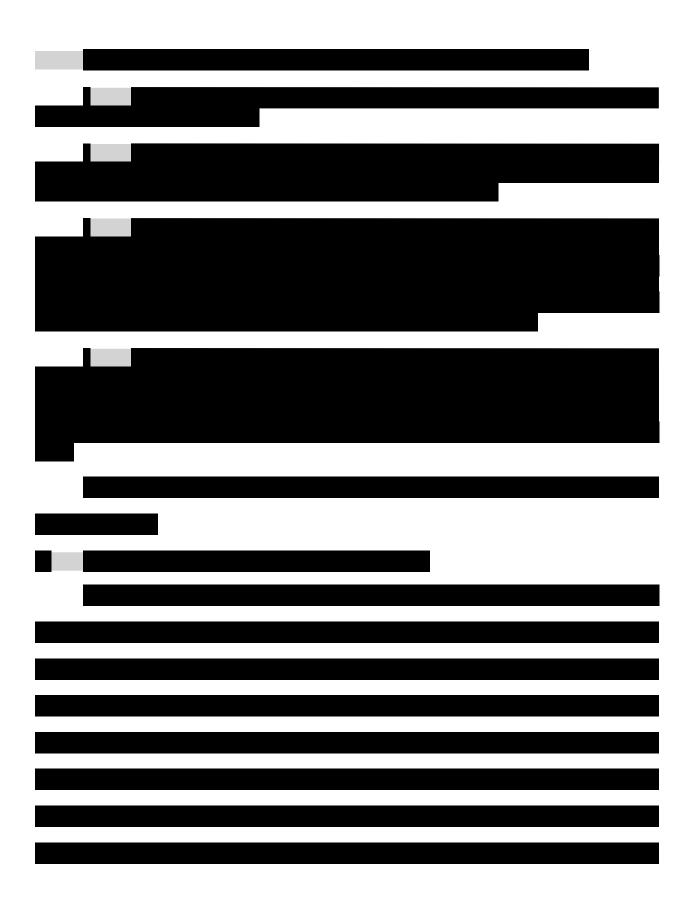
#### **PRELIMINARY STATEMENT**

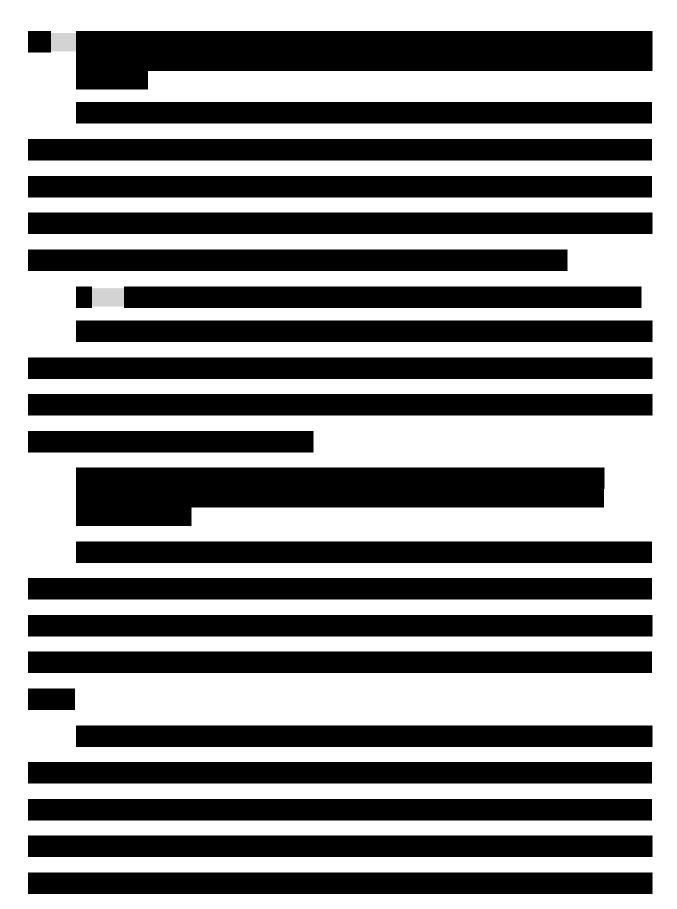


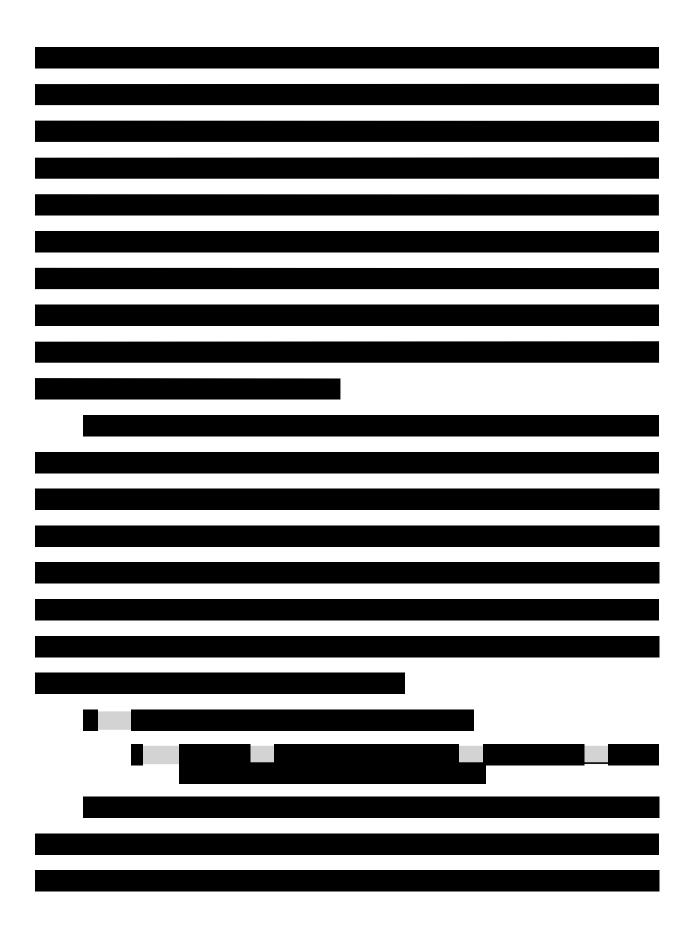






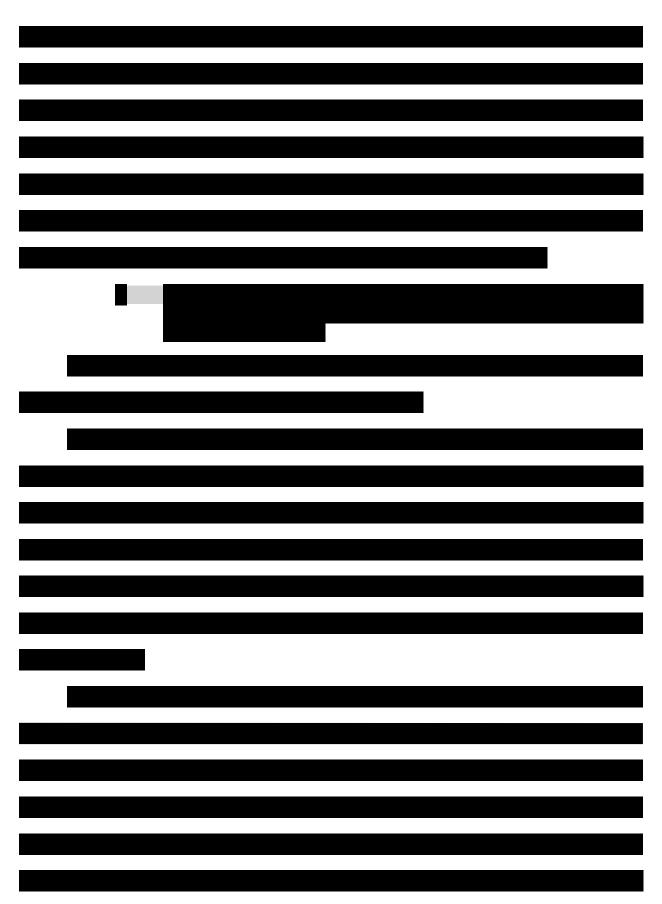


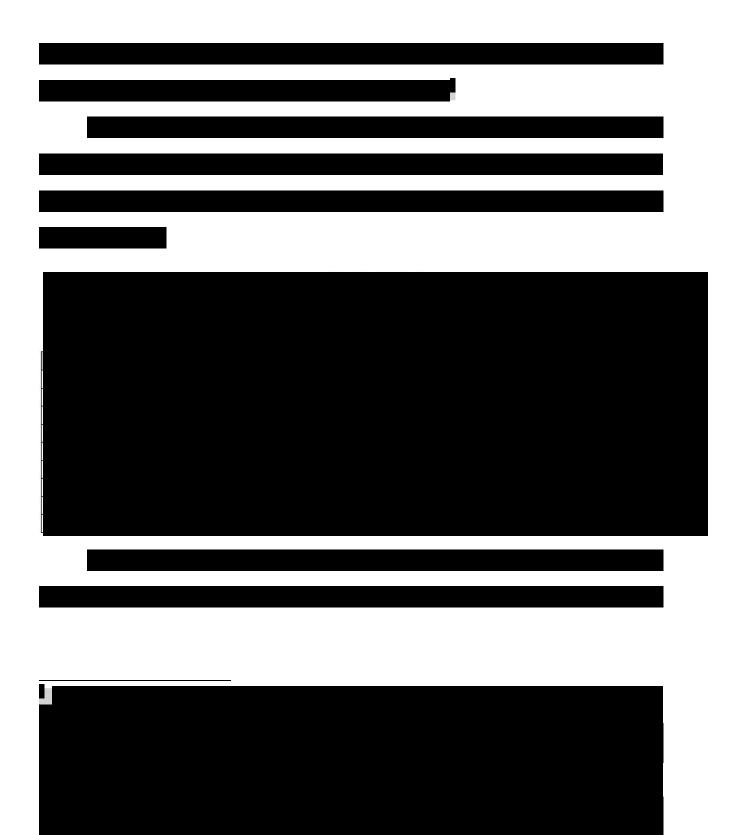


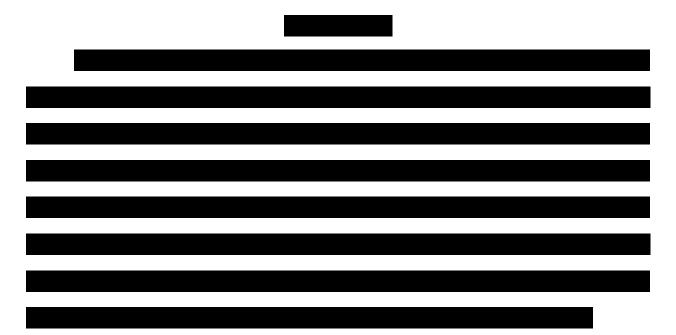


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Dated: March 7, 2017

Respectfully Submitted,

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<sup>&</sup>lt;sup>4</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 7th day of March, 2017, 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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