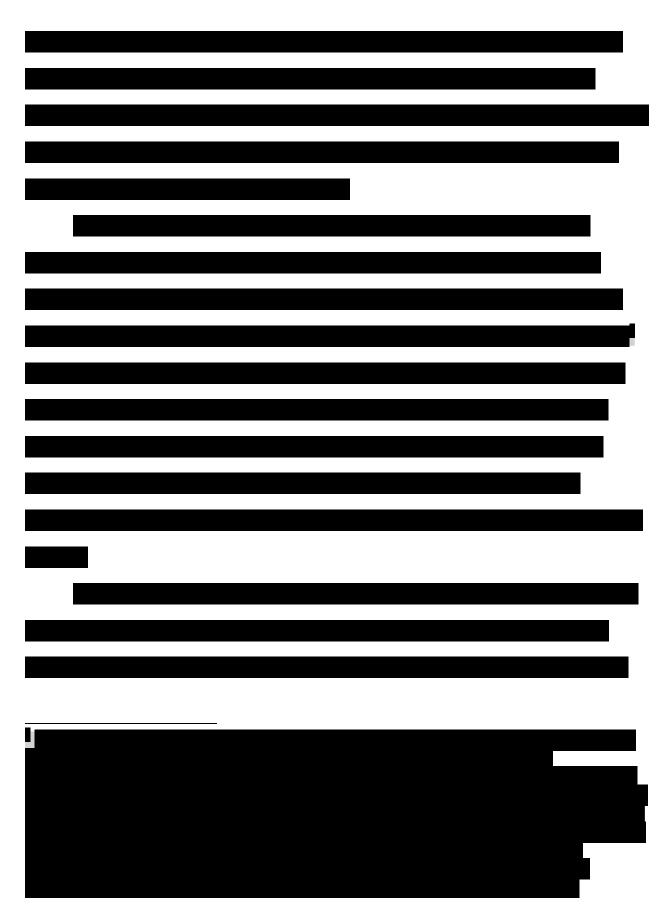
United States District Court Southern District of New York

Virginia L. Giu	iffre,	
	Plaintiff,	Case No.: 15-cv-07433-RWS
v.		
Ghislaine Max	well,	
	Defendant.	

PLAINTIFF'S RESPONSE TO DEFENDANT'S MOTION FOR BIFURCATED TRIAL RELATING TO PUNITIVE DAMAGES AND EXCLUSION OF REFERENCES TO DEFENDANT'S FINANCIAL INFORMATION

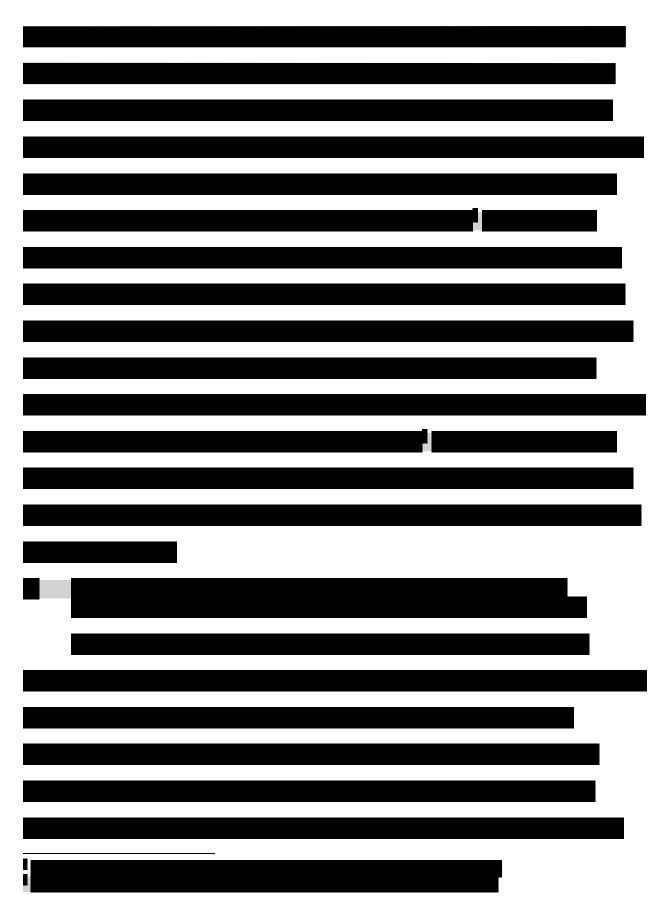
Sigrid McCawley BOIES SCHILLER FLEXNER LLP 401 E. Las Olas Blvd., Suite 1200 Ft. Lauderdale, FL 33301 (954) 356-0011 Plaintiff, Virginia Giuffre, by and through her undersigned counsel, hereby files this response in opposition to Defendant's motion *in limine* (DE 662).

PRELIMINARY STATEMENT

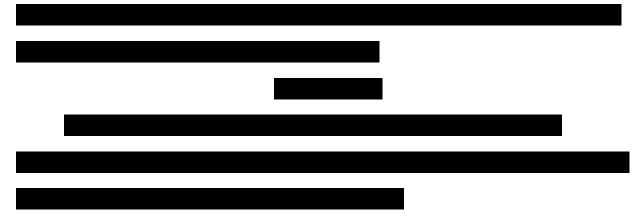


<u>ARGUMENT</u>	





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Dated: March 22, 2017

Respectfully Submitted,

BOIES SCHILLER FLEXNER LLP

By: /s/ Sigrid McCawley
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 22, 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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⁵ 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.