

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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VIRGINIA L. GIUFFRE,
Plaintiff,

v.

GHISLAINE MAXWELL,
Defendant.

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15-cv-07433-RWS

DEFENDANT’S MOTION FOR A PROTECTIVE ORDER

Defendant Ghislaine Maxwell, through undersigned counsel, moves this Court for the entry of a Protective Order pursuant to Rule 26(c) of the Federal Rules of Civil Procedure. In support of this motion, Ms. Maxwell states as follows:

Pursuant to F.R.C.P. 26(c) this Court “may, for good cause, issue an order to protect a party...from annoyance, embarrassment, oppression, or undue burden or expense...” The nature of this case concerns highly personal and sensitive information from both parties. In this action, both parties have sought and will seek confidential information in the course of discovery from the other party and from non-party witnesses. Release of such confidential information outside of the litigation could expose the parties to “annoyance, embarrassment, [and] oppression” and result in significant injury to one or more of the parties’ business or privacy interests.

Plaintiff seeks to take the deposition of defendant Ghislaine Maxwell. Based on written discovery requests served to date, it is anticipated that Plaintiff will seek to question Ms.

Maxwell concerning her personal and professional relationships as well matters concerning her

private affairs. Furthermore, Plaintiff has served Ms. Maxwell with document requests that seek information of a sensitive and confidential nature. Dissemination of such information to third parties could be significantly harmful to Ms. Maxwell's business and personal privacy interests. Good cause exists for entry of this Protective Order.

WHEREFORE, Defendant respectfully requests that the Court grant her Motion for Protective Order in this matter in the form attached as Exhibit A to Declaration of Laura Menninger in Support of Defendant's Motion for a Protective Order.

Dated: March 2, 2016.

Respectfully submitted,

s/ Laura A. Menninger

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Attorneys for Ghislaine Maxwell

CERTIFICATE OF SERVICE

I certify that on March 2, 2016, I electronically filed this *Defendant's Motion for a Protective Order* with the Clerk of Court using the CM/ECF system which will send notification to all counsel of record including the following:

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s/ Brenda Rodriguez

Brenda Rodriguez