

**United States District Court
Southern District of New York**

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

_____/

**NOTICE OF PLAINTIFF'S MOTION FOR LEAVE
TO SERVE ROLLING PRODUCTION AND PRIVILEGE LOG**

Plaintiff, Ms. Giuffre, hereby gives notice, pursuant to Local Civil Rule 7.1, of her Motion for Leave to Serve Rolling Production and Privilege Log pursuant to Local Civil Rule 26.2.

Dated: March 15, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley
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CERTIFICATE OF GOOD FAITH

The undersigned hereby certifies that Counsel for Plaintiff conferred with Defendant's Counsel by sending a detailed letter detailing the request, and counsel for both parties have followed up by placing two phone calls, but have been unable to speak directly due to conflicting schedules, and therefore were unable to resolve the issue. Counsel for Ms. Giuffre files this Motion in an abundance of caution in the even that counsel for the parties cannot complete their conferral process by tomorrow, March 16, 2016, when the Responses and Objections are due. The undersigned counsel will withdraw the instant motion should counsel for the parties reach an agreement prior to adjudication.

/s/ Sigrid S. McCawley
Sigrid S. McCawley

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 15, 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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/s/ Sigrid S. McCawley
Sigrid S. McCawley