

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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VIRGINIA L. GIUFFRE,
Plaintiff,
V.
GHISLAINE MAXWELL,
Defendant.

15-cv-07433-RWS

MOTION FOR ADJOURNMENT OF HEARING ON APRIL 13, 2016

Defendant Ghislaine Maxwell, through her attorneys Jeffrey S. Pagliuca and Laura A. Menninger of the law firm Haddon, Morgan and Foreman, P.C., hereby respectfully moves for a brief adjournment of the April 13 hearing until April 21, 2016, when Ms. Maxwell's Motion to Compel will be heard by this Court. As grounds she asserts as follows:

1. On April 5, 2016, Paul A. Cassell moved to appear *pro hac vice* in this case.
2. On April 6, 2016, Ms. Maxwell submitted a letter motion to the Court opposing his appearance in this case.
3. On April 7, 2016, this Court entered an Order setting a hearing on the motion for Wednesday, April 13, 2016, at 10:00 a.m. EST.

4. Counsel for Ms. Maxwell are both unavailable to appear in New York on April 13, 2016.

5. Mr. Pagliuca is scheduled to appear on that date before the Hon. Christine M. Arguello, U.S. District Court for the District of Colorado, for a final pretrial conference in the matter of *United States v. Tucker*, 14-cr-00402, at 3:00 p.m. MST (5:00 p.m. EST). Trial is scheduled to commence in that case on April 25, 2016.

6. Ms. Menninger is scheduled to participate in a mediation with the U.S. Court of Appeals for the 10th Circuit mediator on April 13, 2016 at 9:00 a.m. MST (11:00 a.m. ET), in the matter of *Valdez v. Derrick, et al.*, Case No. 16-1038.

7. Counsel for Ms. Maxwell also has other various court appearances scheduled between April 13 and April 19, 2016.

8. Counsel for Ms. Maxwell respectfully requests that the hearing on Mr. Cassell's motion to appear *pro hac vice* in this case be adjourned until April 21, 2016 when this Court is scheduled to hear Ms. Maxwell's Motion to Compel.

9. Ms. Maxwell anticipates filing a similar opposition to the appearance of Bradley Edwards, who just filed a motion to appear *pro hac vice*, and would ask that it be contemporaneously with the other motions on April 21st.

Dated: April 7, 2016

Respectfully submitted,

s/ Laura A. Menninger

Laura A. Menninger (LM-1374)

Jeffrey S. Pagliuca (pro hac vice)

HADDON, MORGAN AND FOREMAN, P.C.

150 East 10th Avenue

Denver, CO 80203

Phone: 303.831.7364

Fax: 303.832.2628

lmenninger@hmflaw.com

Attorneys for Ghislaine Maxwell

CERTIFICATE OF SERVICE

I certify that on April 7, 2016, I electronically filed this MOTION FOR ADJOURNMENT OF HEARING ON CASSELL MOTION TO APPEAR PRO HAC VICE with the Clerk of Court using the CM/ECF system which will send notification to the following:

Sigrid S. McCawley
BOIES, SCHILLER & FLEXNER, LLP
401 East Las Olas Boulevard, Ste. 1200
Ft. Lauderdale, FL 33301
smccawley@bsflp.com

/s/ Nicole Simmons

Nicole Simmons