

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

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

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**MS. GIUFFRE'S MOTION FOR LEAVE TO EXCEED PAGE LIMITS FOR RESPONSE**  
**BRIEF TO MOTION**

Plaintiff Virginia L. Giuffre, by and through her undersigned counsel, hereby request that the Court permit the filing of a response memorandum in excess of the 25 pages permitted pursuant to this Court's Practice Standard 2D, and states as follows.

Defendant seeks the extraordinary relief of this Court requiring Ms. Giuffre to turn over her attorney-client communications and work product materials, and seeks that relief with distortions and misstatements of the applicable law. This gamesmanship, specifically targeting documents that are protected by the attorney-client privilege and the work product doctrine, has already failed before a Florida judge. Though finding waiver of the attorney-client privilege and work product doctrine is disfavored, in order make a thorough argument to protect Ms. Giuffre's rights, counsel for Ms. Giuffre is required to exceed the pages permitted.

Accordingly, based on the foregoing, Ms. Giuffre respectfully requests the Court grant her request to exceed the page limit to thoroughly rebut the ungrounded arguments in Defendant's Motion to Compel Attorney-Client Communications and Attorney Work Product Materials.

Dated: June 1, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley  
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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on the 1st day of June, 2016, I served the attached document via Email to the following counsel of record.

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/s/ Sigrid McCawley  
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