

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 filed an approximately 37 page Defendant's Motion to Compel Responses to Defendant's Second Set of Discovery Requests to Plaintiff and for Sanctions (DE 354). In order to respond to the various issues raised in that motion (which, itself, exceeds this Court's page limits), the Response brief requires excess pages.

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 Responses to Defendant's Second Set of Discovery Requests to Plaintiff, and for Sanctions.

DATED: August 17, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

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8.23,16

By: /s/ Meredith Schultz

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 17, 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 to all parties of record via transmission of the Electronic Court Filing System generated by CM/ECF.

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/s/ Meredith Schultz
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