UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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VIRGINIA L. GIUFFRE,		
Plaintiff,		
V.		
GHISLAINE MAXWELL,		15-cv-07433-RWS
Defendant.		
2 oronaum.		
	\mathbf{v}	

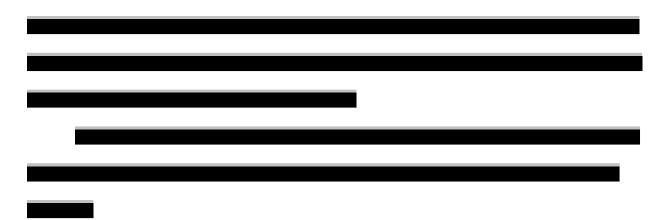
DEFENDANT'S MOTION IN LIMINE TO EXCLUDE EXPERT TESTIMONY AND OPINION OF DOCTOR GILBERT KLIMAN

Laura A. Menninger Jeffrey S. Pagliuca HADDON, MORGAN, AND FOREMAN, P.C. 150 East 10th Avenue Denver, CO 80203 303.831.7364

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CONCLUSION

As the proponent of the testimony the Plaintiff bears the burden of establishing an appropriate evidentiary basis for each and every opinion it intends to offer. The opinions violate numerous rules of evidence and must be excluded.

Ms. Maxwell requests a pre-trial hearing on this issue and that the Court issues a ruling that the opinions expressed in Exhibit A are inadmissible at trial for the above stated reasons.

Dated: January 5, 2017

Respectfully submitted,

/s/ Jeffrey S. Pagliuca

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

303.832.2628 Fax: lmenninger@hmflaw.com

Attorneys for Ghislaine Maxwell

CERTIFICATE OF SERVICE

I certify that on January 5, 2017, I electronically served this *Defendant's Motion In Limine to Exclude Expert Testimony and Opinion of Doctor Gilbert Kliman* via ECF on the following:

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

Bradley J. Edwards FARMER, JAFFE, WEISSING, EDWARDS, FISTOS & LEHRMAN, P.L. 425 North Andrews Ave., Ste. 2 Ft. Lauderdale, FL 33301 brad@pathtojustice.com Paul G. Cassell 383 S. University Street Salt Lake City, UT 84112 cassellp@law.utah.edu

J. Stanley Pottinger 49 Twin Lakes Rd. South Salem, NY 10590 StanPottinger@aol.com

/s/ Nicole Simmons

Nicole Simmons