

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
VIRGINIA L. GIUFFRE,  
  
Plaintiff,  
v.  
GHISLAINE MAXWELL,  
  
Defendant.  
  
-----X

**15-cv-07433-RWS**

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

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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.

Dated: January 5, 2017

/s/ Jeffrey S. Pagliuca

*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:

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