UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

NOTICE OF MOTION FOR SUMMARY JUDGMENT

PLESE TAKE NOTICE THAT, upon the pleadings and papers in this matter, the accompanying Memorandum of Law, the Declaration of Laura A. Menninger and the exhibits annexed thereto, and Defendant's Statement of Material Undisputed Facts Pursuant to Local Civil Rule 56.1, Defendant Ghislaine Maxwell respectfully moves this Court, before the Honorable Robert W. Sweet, for an order pursuant to Federal Rule of Civil Procedure 56 and Local Civil Rule 56.1, granting Defendant's motion for summary judgment and dismissing the Complaint filed on September 21, 2015 in its entirety with prejudice. The grounds for this motion are set forth in the accompanying memorandum of law.

Dated: January 6, 2017

Respectfully submitted,

/s/ Laura A. Menninger

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CERTIFICATE OF SERVICE

I certify that on January 6, 2017, I electronically served this *Defendant's Notice of Motion for Summary Judgment* via ECF on the following:

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/s/ Nicole Simmons

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