

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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VIRGINIA L. GIUFFRE,
Plaintiff,
v.
GHISLAINE MAXWELL,
Defendant.
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15-cv-07433-RWS

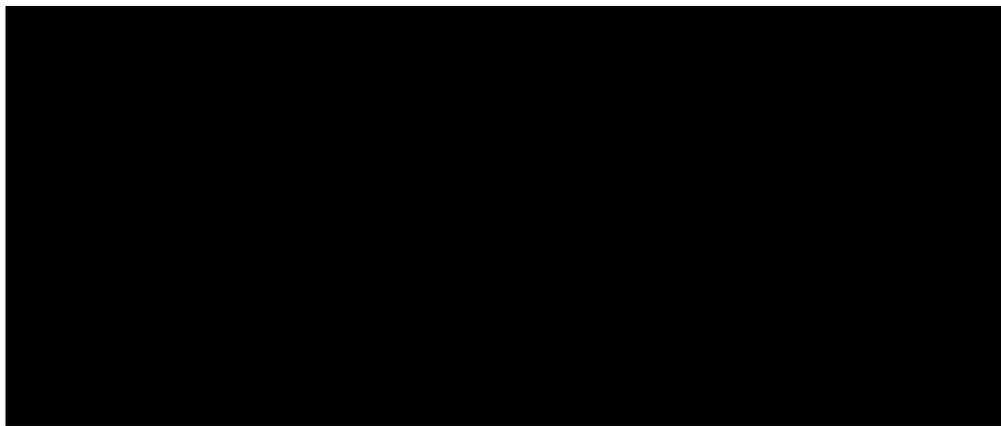
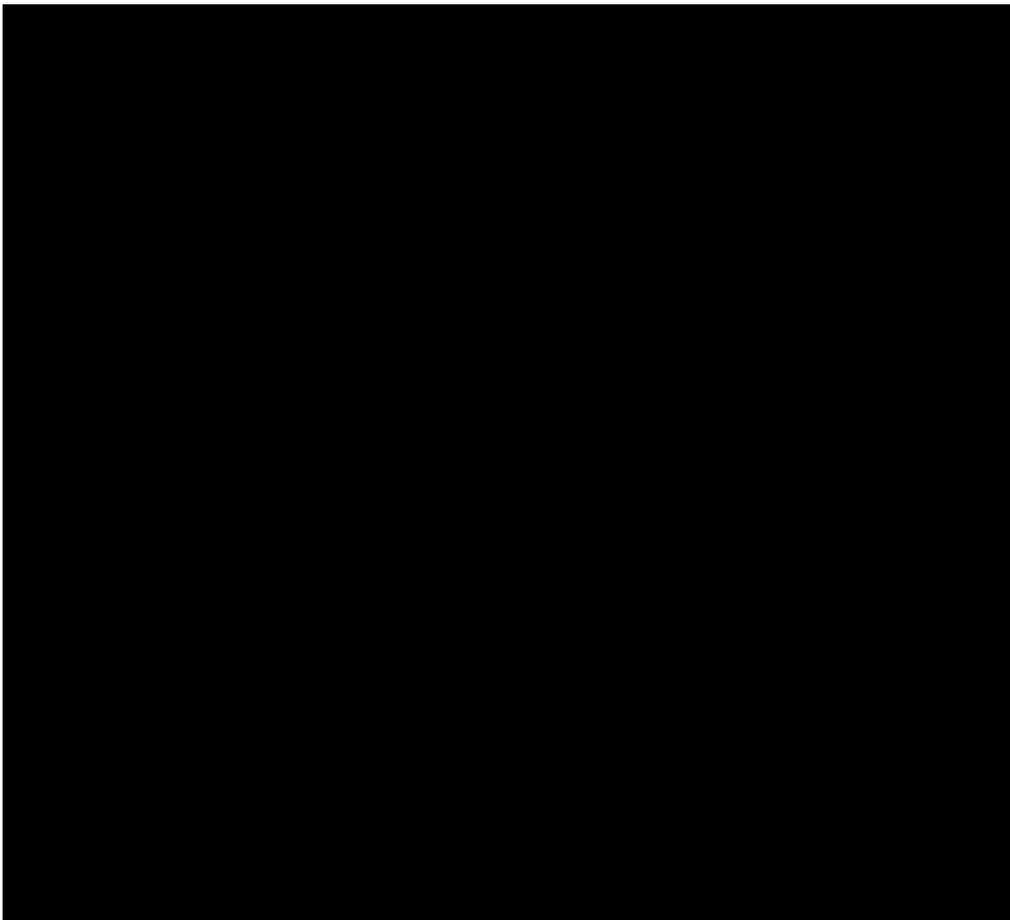
**DEFENDANT’S COUNTER-DESIGNATIONS TO PLAINTIFF’S
DEPOSITION DESIGNATIONS**

Defendant Ghislaine Maxwell, through her attorneys and pursuant to Rule 32 of the Federal Rules of Civil Procedures, hereby submits her counter-designations in accordance with the Court’s October 3, 2016 Scheduling Order (ECF 455) for the trial scheduled to commence on March 13, 2016.

Ms. Maxwell makes these counter-designations based on the designations of testimony by Plaintiff and reserves the right to withdraw any counter-designations should the Court rule in Ms. Maxwell’s favor on the objections raised. Ms. Maxwell reserves her right to use any portions of any deposition for any purpose permissible under the Federal Rules of Civil Procedure and Federal Rules of Evidence. These designations are made subject to Ms. Maxwell’s previously lodged objections to the various designations made by the Plaintiff and subject to anticipated motions in *limine* regarding various evidentiary and legal issues in this matter.

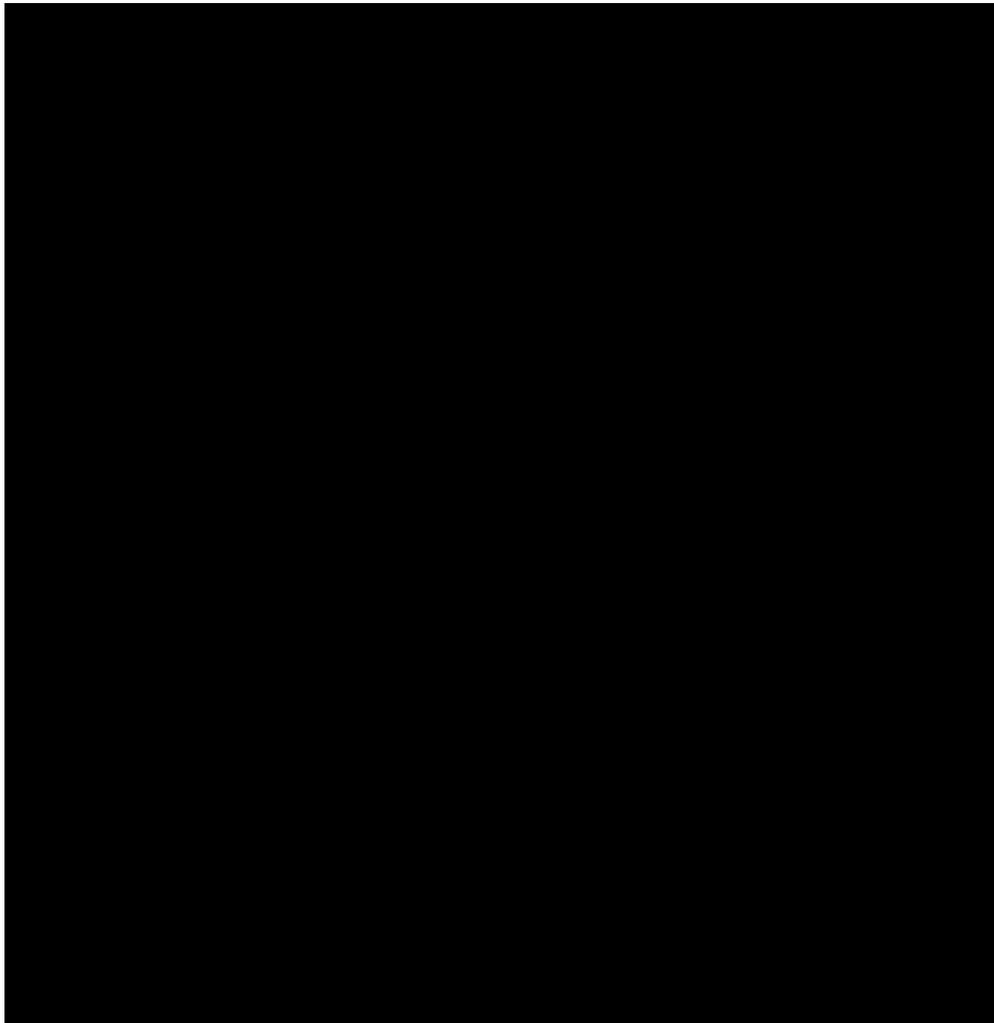
Ms. Maxwell also reserves the right to not present the designated portions of these deposition transcripts as part of her evidence in the trial of this matter and may alter or amend these counter-designations as a result of evidence presented during the Plaintiff's case in chief.

Subject to the foregoing, Ms. Maxwell provides the following designations:



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REDACTED



Dated: February 3, 2017

Respectfully submitted,

/s/ Laura A. Menninger

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CERTIFICATE OF SERVICE

I certify that on February 3, 2017, I electronically served this *Defendant's Counter-Designations to Plaintiff's Deposition Designations* via ECF on the following:

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