

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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

15-cv-07433-RWS

Declaration Of Jeffrey S. Pagliuca In Support Of Defendant’s Motion In *Limine* to Exclude Unauthenticated Hearsay Document from a Suspect Source.

I, Jeffrey S. Pagliuca, declare as follows:

1. I am an attorney at law duly licensed in the State of Colorado and admitted to practice in the United States District Court for the Southern District of New York *pro hac vice*. I am a member of the law firm Haddon, Morgan & Foreman, P.C., counsel of record for Defendant Ghislaine Maxwell (“Maxwell”) in this action. I respectfully submit this declaration in support of her Motion in *Limine* to Exclude Unauthenticated Hearsay Document from a Suspect Source.

2. Attached as Exhibit A (filed under seal) is a true and correct copy of [REDACTED]
[REDACTED]

3. Attached as Exhibit B (filed under seal) are true and correct copies of [REDACTED]
[REDACTED]
[REDACTED]

4. Attached as Exhibit C (filed under seal) are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 3, 2017

By: /s/ Jeffrey S. Pagliuca

Jeffrey S. Pagliuca

CERTIFICATE OF SERVICE

I certify that on March 3, 2017, I electronically served this *Declaration Of Jeffrey S. Pagliuca In Support Of Defendant's Motion In Limine to Exclude Unauthenticated Hearsay Document from a Suspect Source* 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