

**United States District Court
Southern District of New York**

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

**PLAINTIFF MS. GIUFFRE'S MEMORANDUM OF LAW IN
SUPPORT OF HER MOTION *IN LIMINE* TO PRESENT
ALL EVIDENCE OF DEFENDANT'S INVOLVEMENT IN
EPSTEIN SEXUAL ABUSE AND SEX TRAFFICKING**

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TABLE OF CONTENTS

	<u>Page</u>
TABLE OF AUTHORITIES	ii
PRELIMINARY STATEMENT	1
FACTUAL BACKGROUND	1
ARGUMENT	4
I. TO SUPPORT MS. GIUFFRE’S ALLEGATIONS OF DEFENDANT’S INVOLVEMENT IN EPSTEIN’S SEXUAL ABUSE AND TRAFFICKING, SHE SHOULD BE PERMITTED TO PRESENT ALL EVIDENCE OF DEFENDANT’S INVOLVEMENT WITH JEFFREY EPSTEIN’S ORGANIZATION, INCLUDING IN THE ABUSE AND TRAFFICKING.	4
A. Evidence of Defendant’s Involvement in the Sex Trafficking Organization and Scheme Is Directly Relevant to Prove the Truth of Ms. Giuffre’s Allegations Against Defendant.	4
B. Evidence of Defendant’s Involvement in Epstein’s Sex Trafficking Organization Is Also Admissible Under Rule 404(b) to Show Motive and Plan.	7
C. Evidence of Defendant’s Involvement in Epstein’s Sex Trafficking Organization Is Also Admissible Under Rule 404(b) to Show Opportunity, Knowledge, and Ability.	8
D. Evidence of Defendant’s Involvement in Epstein’s Sex Trafficking Organization Is Also Admissible Under Rule 415 as Related Sex Crimes Evidence.	10
CONCLUSION	13
CERTIFICATE OF SERVICE	14

TABLE OF AUTHORITIES

	<u>Page</u>
 <u>Cases</u>	
<i>Blind-Doan v. Sanders</i> , 291 F.3d 1079 (9th Cir. 2002)	12
<i>Dosier v. Miami Valley Broadcasting Corp.</i> , 656 F.2d 12954 (9th Cir. 1981).....	9
<i>Jane Does v. United States</i> , No. 9:08-cv-80736-KAM (S.D. Fla. Dec. 30, 2014)	3
<i>Martinez v. Cui</i> , 608 F. 3d 54 (1st Cir. 2010).....	11
<i>McMahon v. Valenzuela</i> , 2015 WL 7573620, Case No. 2:14 CV-02085 CAS (C.D. Ca. Nov. 25, 2015).....	11
<i>Morris v. Eversley</i> , 2004 WL 856301, No. 00 Civ. 8166 DC (S.D.N.Y. Apr. 20, 2004)	11
<i>Roshan v. Fard</i> , 705 F.2d 102 (4th Cir. 1983)	7
<i>United States v. Barnason</i> , 852 F. Supp. 2d 367 (S.D.N.Y. 2012).....	10, 11, 12
<i>United States v. Larson</i> , 112 F.3d 600 (2d Cir. 1997).....	11
<i>United States v. Levy</i> , 731 F.2d 997 (2d Cir. 1984).....	9
 <u>Rules</u>	
Fed. R. Evid. 401	6
Fed. R. Evid. 402	6
Fed. R. Evid. 403	10, 11
Fed. R. Evid. 413-415	11
Fed. R. Evid. 415	<i>passim</i>

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ARGUMENT

- I. TO SUPPORT MS. GIUFFRE’S ALLEGATIONS OF DEFENDANT’S INVOLVEMENT IN EPSTEIN’S SEXUAL ABUSE AND TRAFFICKING, SHE SHOULD BE PERMITTED TO PRESENT ALL EVIDENCE OF DEFENDANT’S INVOLVEMENT WITH JEFFREY EPSTEIN’S ORGANIZATION, INCLUDING IN THE ABUSE AND TRAFFICKING.**

[REDACTED]

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- A. Evidence of Defendant’s Involvement in the Sex Trafficking Organization and Scheme Is Directly Relevant to Prove the Truth of Ms. Giuffre’s Allegations Against Defendant.**

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

C. Evidence of Defendant's Involvement in Epstein's Sex Trafficking Organization Is Also Admissible Under Rule 404(b) to Show Opportunity, Knowledge, and Ability.

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D. Evidence of Defendant's Involvement in Epstein's Sex Trafficking Organization Is Also Admissible Under Rule 415 as Related Sex Crimes Evidence

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CONCLUSION

For all of the foregoing reasons, Ms. Giuffre respectfully requests that the Court permit her to introduce all evidence concerning Defendant's participation in her and Epstein's sexual abuse of females, and all evidence concerning Defendant's participation and role in her and Epstein's sex trafficking organization.

Dated: March 3, 2017

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 3rd day of March, 2017, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I also certify that the foregoing document is being served this day on the individuals identified below via transmission of Notices of Electronic Filing generated by CM/ECF.

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