

United States District Court  
Southern District of New York

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

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**PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION IN LIMINE TO  
EXCLUDE THE COMPLAINT AND SETTLEMENT AGREEMENT IN  
JANE DOE 102 V. JEFFREY EPSTEIN**

Plaintiff, Virginia Giuffre, by and through her undersigned counsel, hereby files this Opposition to Defendant's Motion to Exclude the Complaint and Settlement Agreement in Jane Doe 102 v. Jeffrey Epstein.

**PRELIMINARY STATEMENT**

Defendant wrongly seeks to exclude the Complaint from Ms. Giuffre's action against Jeffrey Epstein which was filed on May 11, 2009, styled *Jane Doe 102 v. Jeffrey Epstein*, No. 9:09-cv-80656-KAM in the United States District Court for the Southern District of Florida.<sup>1</sup>

[REDACTED]

[REDACTED]

[REDACTED]

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<sup>1</sup> At that point, many if not all of the Complaints against Epstein pursuant to his plea agreement to fund such lawsuits against him were styled as "Jane Doe" to protect the privacy of his underage victims.

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Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on the 17th day of March, 2017, I served the attached document via CM/ECF and e-mail to the following counsel of record.

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<sup>2</sup> This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah for this private representation.