

**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 RESPONSE TO DEFENDANT'S MOTION TO
EXCLUDE EVIDENCE PURSUANT TO FED. R. EVID. 404(B)**

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Plaintiff, Ms. Virginia Giuffre, respectfully submits this memorandum of law in response and opposition to Defendant's Motion to Exclude Evidence Pursuant to Fed. R. Evid. 404(b).



A scatter plot showing the relationship between two variables across 15 categories. The x-axis represents a numerical scale from 0 to 100, with major ticks at 0, 50, and 100. The y-axis lists 15 categories, each represented by a horizontal bar. The length of each bar corresponds to the value of the second variable for that category.

Category	Value
1	~10
2	~95
3	~98
4	~95
5	~98
6	~95
7	~98
8	~95
9	~98
10	~95
11	~98
12	~95
13	~98
14	~95
15	~5

10. The following table summarizes the results of the study. The first column lists the variables used in the model, the second column lists the estimated coefficients, and the third column lists the standard errors of the estimates.

10. The following table summarizes the results of the study. The first column lists the variables, the second column lists the estimated coefficients, and the third column lists the standard errors. The fourth column lists the t-statistics, and the fifth column lists the p-values. The sixth column lists the adjusted R-squared values. The seventh column lists the F-statistics, and the eighth column lists the p-values. The ninth column lists the Durbin-Watson statistics, and the tenth column lists the heteroskedasticity statistics.

1

100% of the time, we're here to help you get what you need.

This image is a high-contrast, black-and-white scan of a textured surface. The left side is dominated by a dark, almost black, area with fine, vertical grain-like texture. A prominent, bright white shape is located on the right side, roughly triangular in form. This white shape has a jagged, stepped boundary, suggesting it might be a cutout or a hole in a material. The overall composition is minimalist and abstract.

Three horizontal black bars of varying lengths are positioned across the bottom of the page, obscuring sensitive information.

The image consists of a vertical stack of horizontal black bars. There are ten bars in total. From top to bottom: 1. A full-length black bar. 2. A full-length black bar. 3. A full-length black bar. 4. A full-length black bar. 5. A full-length black bar. 6. A full-length black bar. 7. A bar that is approximately two-thirds of the length of the others. 8. A bar that is approximately one-third of the length of the others. 9. A bar that is approximately one-third of the length of the others. 10. A bar that is approximately one-third of the length of the others. Each bar is separated by a small gap from the next. The bars are solid black and have thin black outlines.

¹ Each of the bullet points below represent a different witness who will testify.

The image consists of a series of horizontal black bars of varying lengths, arranged vertically. The bars represent different data points or categories. The lengths of the bars vary significantly, with some being very short and others being very long. There are also a few bars that are partially cut off at the top and bottom edges of the frame. The overall pattern suggests a distribution or ranking of the data points.

Term	Percentage (%)
Depression	100
Anxiety	100
Stress	100
Insomnia	100
PTSD	100
Obsessive Compulsive Disorder (OCD)	100
Generalized Anxiety Disorder (GAD)	100
Major Depressive Disorder (MDD)	100
Manic Depression (Bipolar Disorder)	100
Schizophrenia	100
Psychosis	~75
Dissociation	~65
Borderline Personality Disorder (BPD)	~55
Autism Spectrum Disorder (ASD)	~45
Attention Deficit Hyperactivity Disorder (ADHD)	~35
Generalized Anxiety	~25
Specific Phobia	~15
Acute Stress Reaction	~10
Post-Traumatic Stress Response	~5

A large black rectangular redaction box covers the majority of the page content, starting below the header and ending above the footer. The redaction is irregularly shaped, with jagged edges and some white space visible at the bottom right corner.

The figure consists of a vertical stack of approximately 20 horizontal bars. The bars are primarily black, representing the majority of the data points. Interspersed among these black bars are several shorter bars of different colors: white, light gray, and dark gray. The lengths of the bars vary significantly, with some being very short and others extending almost to the top of the frame. The colors of the bars are consistently applied across each bar's length, indicating a single data series represented by different visual styles.







The figure consists of 18 horizontal bars arranged vertically. Each bar's length corresponds to a numerical value for a specific category. The bars are solid black, except for a few which contain internal white segments. The categories are represented by the following bar lengths (approximate values):

- Category 1: 100%
- Category 2: 100%
- Category 3: 100%
- Category 4: 100%
- Category 5: 100%
- Category 6: 100%
- Category 7: 100%
- Category 8: 100%
- Category 9: 100%
- Category 10: 100%
- Category 11: 100%
- Category 12: 100%
- Category 13: 100%
- Category 14: 100%
- Category 15: 100%
- Category 16: 100%
- Category 17: 100%
- Category 18: 100%

A series of horizontal black bars of varying lengths, representing data points. The bars are arranged vertically from top to bottom. Some bars have small gray segments at their left ends.

The image consists of a series of horizontal black bars of varying lengths, arranged vertically. At the top left, there is a small gray rectangular bar. At the bottom left, there is a larger gray rectangular bar. The other bars are solid black and have different widths, creating a visual pattern of alternating colors and sizes.

A series of horizontal black bars of varying lengths, representing data points. The bars are arranged vertically, with some having small gray segments at their start or end.

The image consists of a series of horizontal black bars of varying lengths, primarily located at the top and bottom of the frame. A large, solid black rectangular area occupies the central portion of the page, extending from approximately one-third of the way down to two-thirds of the way up. This central redaction covers several lines of text that would otherwise be visible.

² The only evidence this Court excluded was evidence of Barnason's prior conviction that dealt with vastly different facts including his assault of a young child that came to meet Barnason's daughter to trade stickers and another incident where he played "doctor" with his daughter's young friends. *Id.* at 376. This Court excluded that evidence because the assaults were vastly different than the assaults on the tenants in the building. *Id.* at 377.

This figure consists of a series of horizontal bars, all colored black except for categories 6 and 19 which contain gray bars. The bars are arranged vertically, representing 20 distinct categories. Categories 6 and 19 each have two bars, while all other categories have a single bar.

Category	Value
1	Black
2	Black
3	Black
4	Black
5	Black
6	Gray
6	Black
7	Gray
7	Black
8	Black
9	Black
10	Black
11	Black
12	Black
13	Black
14	Black
15	Black
16	Black
17	Black
18	Black
19	Gray
19	Black
20	Black

³ Of course, other reasons may develop at trial for the admissibility of this evidence, but the Court can make a pre-trial ruling based upon applicable law that applies at this stage of proceedings.

CONCLUSION

For all of the foregoing reasons, Ms. Giuffre respectfully requests that the Court deny Defendant's motion in limine and 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 17, 2017

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 17, 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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