

**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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**MS. GIUFFRE'S RESPONSE IN OPPOSITION TO DEFENDANT'S MOTION IN  
LIMINE TO EXCLUDE EVIDENCE BARRED AS A RESULT OF PLAINTIFF'S  
[ALLEGED] SUMMARY JUDGMENT CONCESSIONS [DE 666]**

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Plaintiff, Ms. Giuffre hereby files her response in opposition to Defendant's Motion in Limine to Exclude Evidence Barred as a Result of Plaintiff's [Alleged] Summary Judgment Concessions, and states as follows.

**I. PRELIMINARY STATEMENT OF LAW**

As the Court is aware, [REDACTED]

**II. LEGAL ARGUMENT**

[REDACTED]

[Redacted text block]

[Redacted]



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**III. CONCLUSION**

For the reasons stated above, Ms. Giuffre respectfully asks this Court to deny Defendant's motion in its entirety.

Dated: March 21, 2017

Respectfully Submitted,

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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.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on March 21, 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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