

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 Reply
in Support of Objection to Production of [REDACTED]
[REDACTED] Submitted for in Camera Review**

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 Ms. Maxwell's Reply in Support of Objection to Production of [REDACTED] Submitted for in Camera Review.

2. Attached as Exhibit A (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 April 11, 2017

By: /s/ Jeffrey S. Pagliuca
Jeffrey S. Pagliuca

CERTIFICATE OF SERVICE

I certify that on April 11, 2017, I electronically served this *Declaration Of Jeffrey S. Pagliuca In Support Of Defendant's Reply in Support of Objection to Production of [REDACTED]* Submitted for in Camera Review via ECF on the following:

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/s/ Nicole Simmons

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