

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



-----X
VIRGINIA L. GIUFFRE,

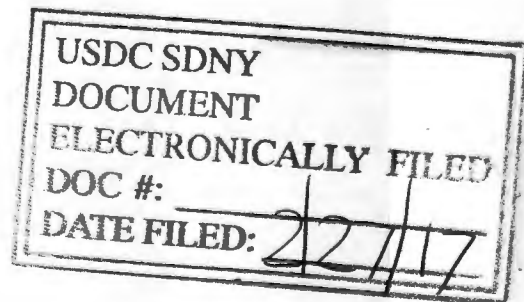
Plaintiff,
v.
GHISLAINE MAXWELL,

Defendant.
-----X

15-cv-07433-RWS

AMENDED SECOND PROPOSED DISCOVERY AND CASE MANAGEMENT
DEADLINES AND REQUEST TO MODIFY PRETRIAL SCHEDULING ORDER

So ordered
Sweet
2-24-17



The Parties, through their respective counsel, propose the following case management deadlines and request that the Court enter an order modifying its Order of October 3, 2016, ECF #455 for the following reasons:

Subsequent to the hearing on February 16, 2017 the parties have conferred extensively about the viability of the existing case management deadlines. The parties agree that the previous deadlines are no longer tenable. Accordingly, subject to the Court's approval and availability the parties propose the following schedule:

The jury trial scheduled for March 13, 2017 is rescheduled to begin on May 15, 2017 and is anticipated to last four weeks;

Motions in Limine/other motions shall be filed by March 3, 2017;

Final Exhibit lists shall be exchanged by the parties no later than April 3, 2017 and submitted to the Court by April 15, 2017;

The Revised Joint Pre-trial Order shall be submitted by April 15, 2017;

Proposed agreed upon/disputed Jury Instructions and Verdict forms shall be submitted by April 24, 2017;

Proposed jury questions shall be submitted by May 1, 2017.

The parties suggest that the Court may wish to consider scheduling hearings on outstanding issues, as necessary, as follows:

March 9, 2017, hearing on Plaintiff Giuffre's Motion to Present Testimony from Jeffrey Epstein for Purposes of Obtaining an Adverse Inference, ECF #608, hearing on Plaintiff's Motion to Compel all Work Product and Attorney Client Communications with Philip Barden, ECF #637, hearing on outstanding motions including Motion to Quash Edwards Subpoena, filed in the Southern District of Florida on June 13, 2016 under case number 16-mc-61262, and

March 23, 2017, hearing on 702 Motions ECF #520, 522, 524, 526, 528, 530, 533, 535 and motions *in limine*.

April 6, 2017, hearing on objections to deposition designations.

May 4, 2017, Pre-trial Conference to address any outstanding issues including confidentiality.

WHEREFORE, the parties request that the Court adopt the proposed schedule and modify the Court's Order of October 3, 2016 to reflect the above deadlines.

Dated: February 23, 2017

Respectfully submitted,

/s/ Bradley J. Edwards

Bradley J. Edwards
FARMER, JAFFE, WEISSING, EDWARDS,
FISTOS & LEHRMAN, P.L.
425 North Andrews Ave., Ste. 2
Ft. Lauderdale, FL 33301
brad@pathtojustice.com

Attorney for Virginia Giuffre

/s/ Jeffrey S. Pagliuca

Laura A. Menninger (LM-1374)
Jeffrey S. Pagliuca (*pro hac vice*)
Ty Gee (*pro hac vice*)
HADDON, MORGAN AND FOREMAN, P.C.
150 East 10th Avenue
Denver, CO 80203
Phone: 303.831.7364
Fax: 303.832.2628
jpagliuca@hmflaw.com

Attorneys for Ghislaine Maxwell

CERTIFICATE OF SERVICE

I certify that on February 23, 2017, I electronically served this *AMENDED SECOND PROPOSED DISCOVERY AND CASE MANAGEMENT DEADLINES AND REQUEST TO MODIFY PRETRIAL SCHEDULING ORDER* via ECF on the following:

Sigrid S. McCawley
Meredith Schultz
BOIES, SCHILLER & FLEXNER, LLP
401 East Las Olas Boulevard, Ste. 1200
Ft. Lauderdale, FL 33301
smccawley@bsfllp.com
mschultz@bsfllp.com

Bradley J. Edwards
FARMER, JAFFE, WEISSING, EDWARDS,
FISTOS & LEHRMAN, P.L.
425 North Andrews Ave., Ste. 2
Ft. Lauderdale, FL 33301
brad@pathtojustice.com

Paul G. Cassell
383 S. University Street
Salt Lake City, UT 84112
cassellp@law.utah.edu

J. Stanley Pottinger
49 Twin Lakes Rd.
South Salem, NY 10590
StanPottinger@aol.com

/s/ Nicole Simmons

Nicole Simmons