

**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 MEMORANDUM OF LAW IN
SUPPORT OF HER MOTION *IN LIMINE* TO PRESENT
ALL EVIDENCE OF DEFENDANT'S INVOLVEMENT IN
EPSTEIN SEXUAL ABUSE AND SEX TRAFFICKING**

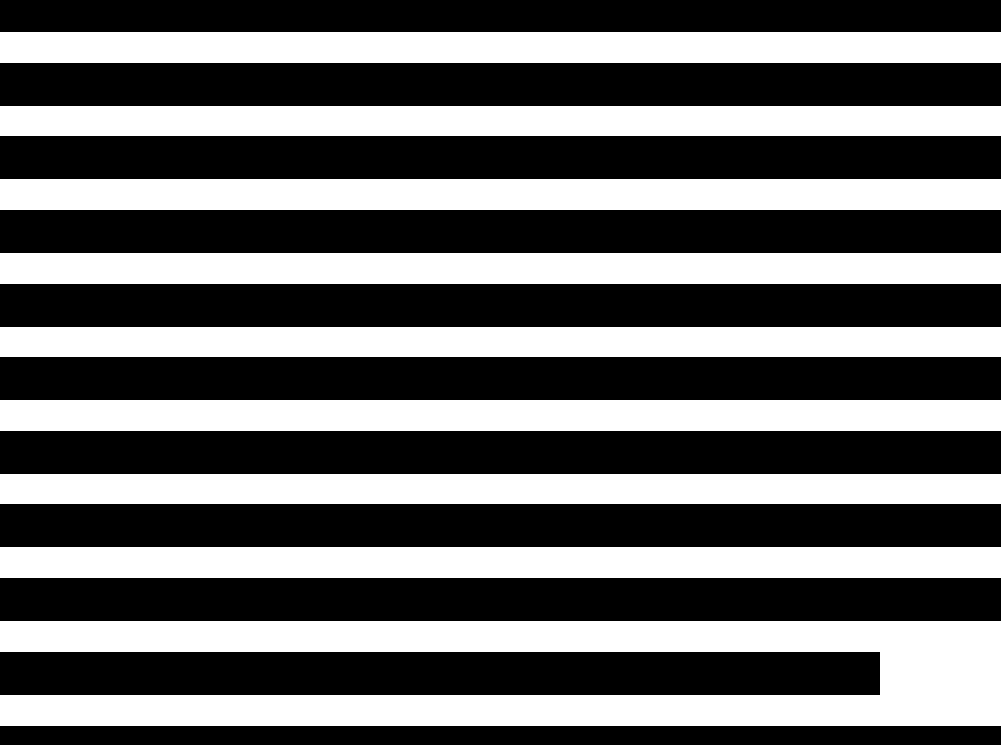
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[REDACTED]

[REDACTED]

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ARGUMENT

- I. TO SUPPORT MS. GIUFFRE’S ALLEGATIONS OF DEFENDANT’S INVOLVEMENT IN EPSTEIN’S SEXUAL ABUSE AND TRAFFICKING, SHE SHOULD BE PERMITTED TO PRESENT ALL EVIDENCE OF DEFENDANT’S INVOLVEMENT WITH JEFFREY EPSTEIN’S ORGANIZATION, INCLUDING IN THE ABUSE AND TRAFFICKING.**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- A. Evidence of Defendant’s Involvement in the Sex Trafficking Organization and Scheme Is Directly Relevant to Prove the Truth of Ms. Giuffre’s Allegations Against Defendant.**

[REDACTED]

[REDACTED]

[REDACTED]

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2	Black	95
3	Black	100
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5	Gray/Black	10
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14	Black	95
15	Black	98
16	Black	95
17	Gray/Black	10
18	Black	100
19	Black	95
20	Black	10

[REDACTED]

C. Evidence of Defendant’s Involvement in Epstein’s Sex Trafficking Organization Is Also Admissible Under Rule 404(b) to Show Opportunity, Knowledge, and Ability.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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D. Evidence of Defendant's Involvement in Epstein's Sex Trafficking Organization Is Also Admissible Under Rule 415 as Related Sex Crimes Evidence

[REDACTED]

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[REDACTED]

[REDACTED]

CONCLUSION

For all of the foregoing reasons, Ms. Giuffre respectfully requests that the Court 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 3, 2017

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 3rd day of March, 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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