

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

VIRGINIA GIUFFRE,	:	
	:	
Plaintiff,	:	
v.	:	No. 15-cv-07433-RWS
	:	
GHISLAINE MAXWELL,	:	ECF CASE
	:	
Defendant.	:	ORAL ARGUMENT REQUESTED

**NOTICE OF MOTION TO QUASH (OR IN THE ALTERNATIVE
MODIFY) SUBPOENA AND FOR A PROTECTIVE ORDER**

PLEASE TAKE NOTICE that upon the accompanying declaration of Gregory L. Poe dated June 16, 2016, the exhibits attached to the declaration, the accompanying memorandum of law, and all pleadings and proceedings herein, the undersigned will move this Court, before the Honorable Robert W. Sweet, United States District Judge for the Southern District of New York, for an order pursuant to Fed. R. Civ. P. 26 and Fed. R. Civ. P. Rule 45(d)(3) to quash (or in the alternative modify) a subpoena served by plaintiff Virginia Giuffre on non-party Jeffrey Epstein, and for a protective order and such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to S.D.N.Y. Local Civil Rule 6.1 and Rule 6(d) of the Federal Rules of Civil Procedure, opposing papers, if any, and reply papers, if any, must be served in accordance with the rules, with argument to be heard on July 7, 2016 (the first Thursday following the completion of briefing) or on a later date convenient for the Court.

Dated: June 16, 2016

Respectfully submitted,

/s/ Gregory L. Poe

Gregory L. Poe (*pro hac vice* application pending)

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Counsel for Non-Party Jeffrey Epstein

CERTIFICATE OF SERVICE

I hereby certify that, on this 16th day of June, 2016, I caused a true and correct copy of Jeffrey Epstein's Notice of Motion to Quash (or in the Alternative Modify) Subpoena and for a Protective Order to be served via the Court's CM/ECF system on the following:

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