

**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
COMBINED RESPONSE TO PLAINTIFF'S MOTION TO COMPEL DEFENDANT
TO ANSWER DEPOSITION QUESTIONS FILED UNDER SEAL AND MOTION
TO TERMINATE OR LIMIT PURSUANT TO F.R.CIV.P. 30(d)(3)**

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 and Foreman, P.C., counsel of record for Defendant Ghislaine Maxwell ("Maxwell") in this action. I respectfully submit this declaration in support of Maxwell's Combined Response to Plaintiff's Motion to Compel Defendant to Answer Deposition Questions Filed Under Seal and Motion to Terminate or Limit Pursuant to F.R.Civ.P. 30(d)(3).

2. Attached as Exhibit A is a true and correct copy of [REDACTED]

[REDACTED]

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 10, 2016 in Denver, Colorado.

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

CERTIFICATE OF SERVICE

I certify that on May 10, 2016, I electronically served this *DECLARATION OF JEFFREY S. PAGLIUCA IN SUPPORT OF DEFENDANT'S COMBINED RESPONSE TO PLAINTIFF'S MOTION TO COMPEL DEFENDANT TO ANSWER DEPOSITION QUESTIONS FILED UNDER SEAL AND MOTION TO TERMINATE OR LIMIT PURSUANT TO F.R.CIV.P. 30(d)(3)* via ECF on the following:

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/s/ Nicole Simmons
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