

**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 RESPONSE TO
DEFENDANT'S MOTION TO PROHIBIT QUESTIONING
REGARDING DEFENDANTS' ADULT CONSENSUAL ACTIVITIES**

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Plaintiff, Ms. Virginia Giuffre, respectfully submits this memorandum of law in response and opposition to Defendant's Motion to Prohibit Questioning Regarding Defendant's Adult Consensual Activities.

PRELIMINARY STATEMENT

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The image consists of a single, uniform black rectangle that fills the entire frame. There are no discernible features, text, or patterns other than the solid black color.

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A horizontal bar chart consisting of 15 bars. The bars are arranged vertically. Most bars are solid black. There are four bars that have a light gray segment at the beginning, followed by a black segment. The lengths of the bars vary significantly, with some being very long and others being very short. The bars are roughly ordered from top to bottom: 1. Long black bar. 2. Long black bar. 3. Short black bar. 4. Bar with light gray segment and long black segment. 5. Long black bar. 6. Medium black bar. 7. Bar with light gray segment and long black segment. 8. Long black bar. 9. Long black bar. 10. Long black bar. 11. Long black bar. 12. Medium black bar. 13. Short black bar. 14. Bar with light gray segment and long black segment. 15. Long black bar.

[illegible]

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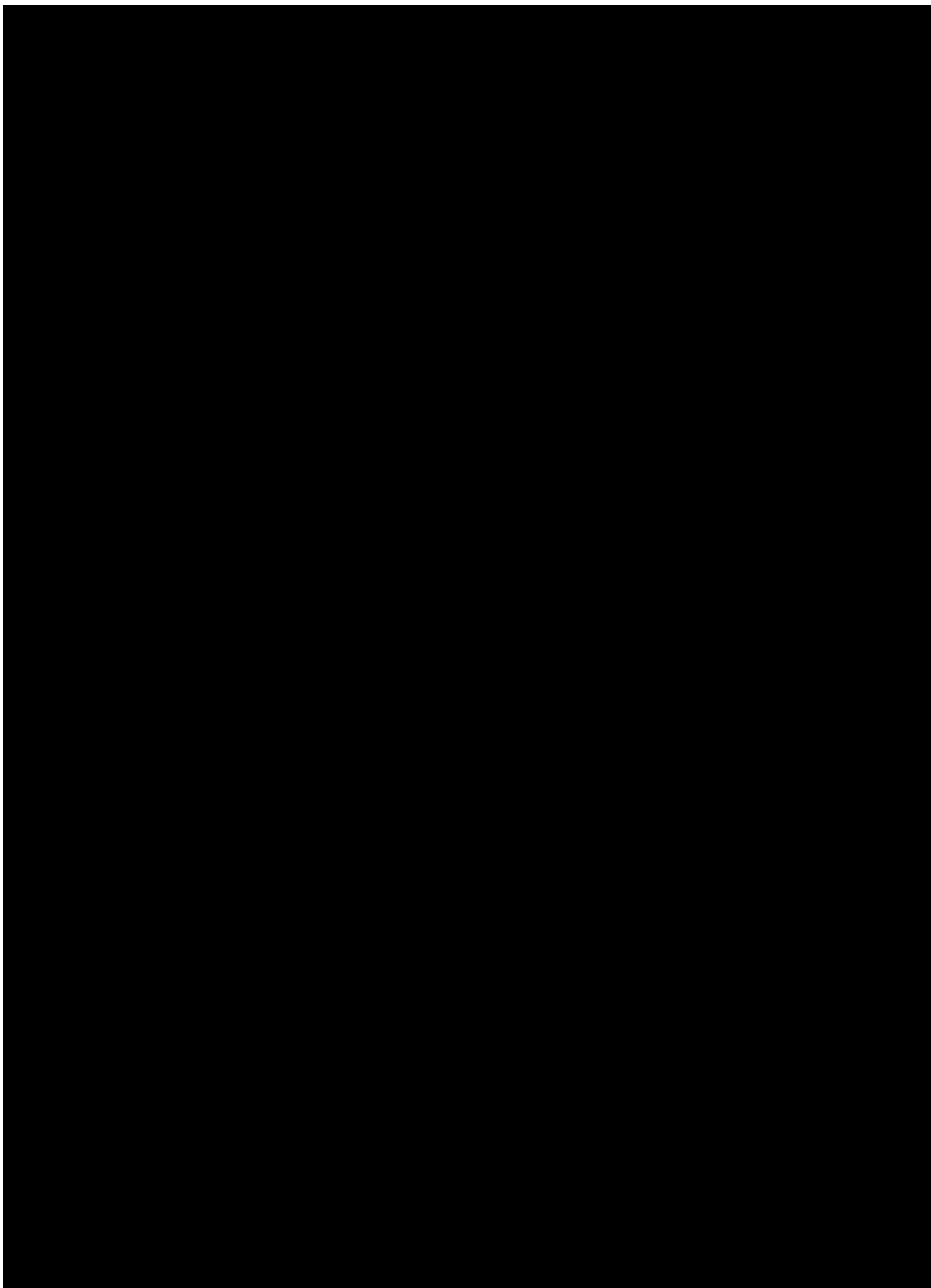
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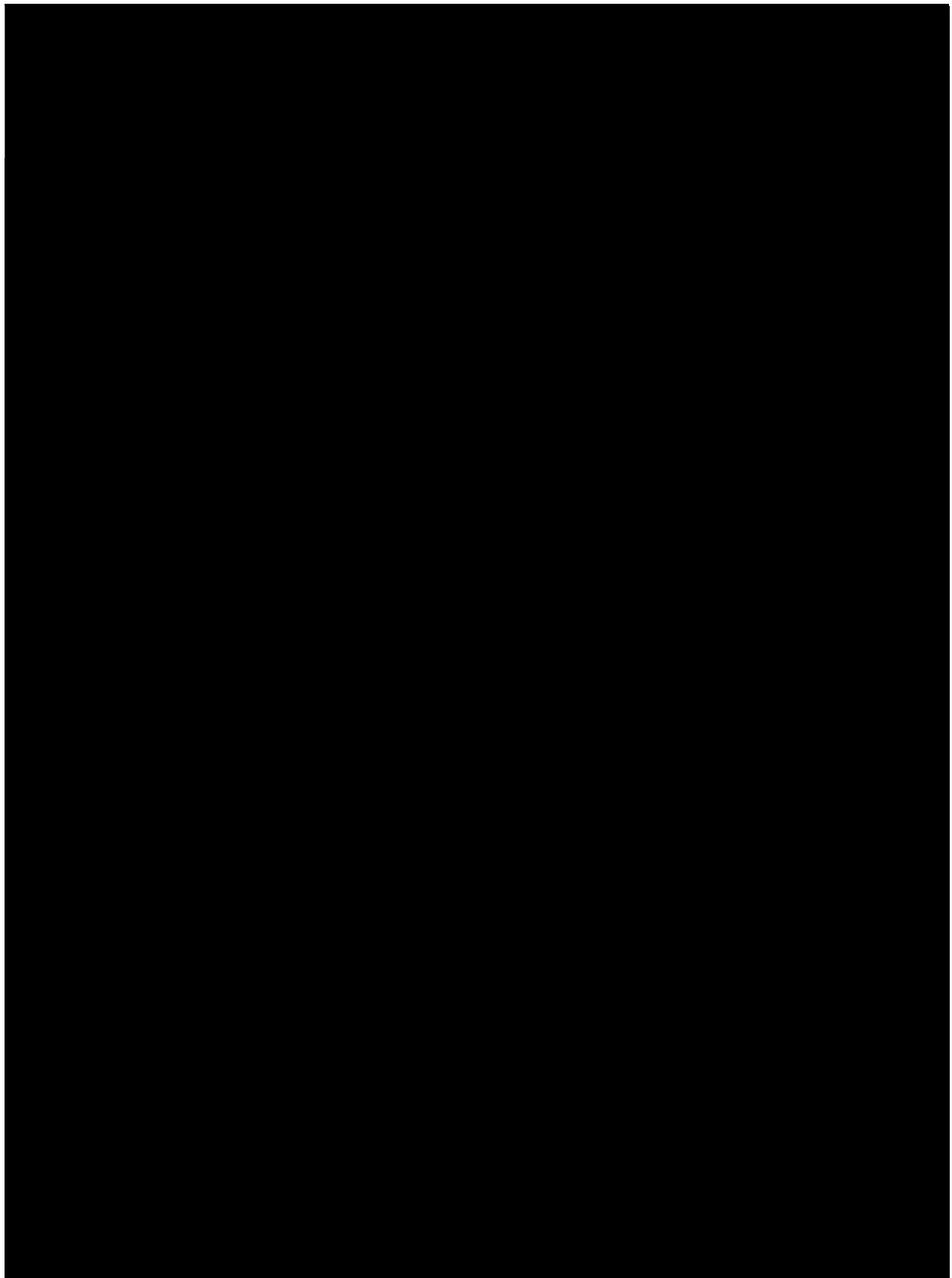
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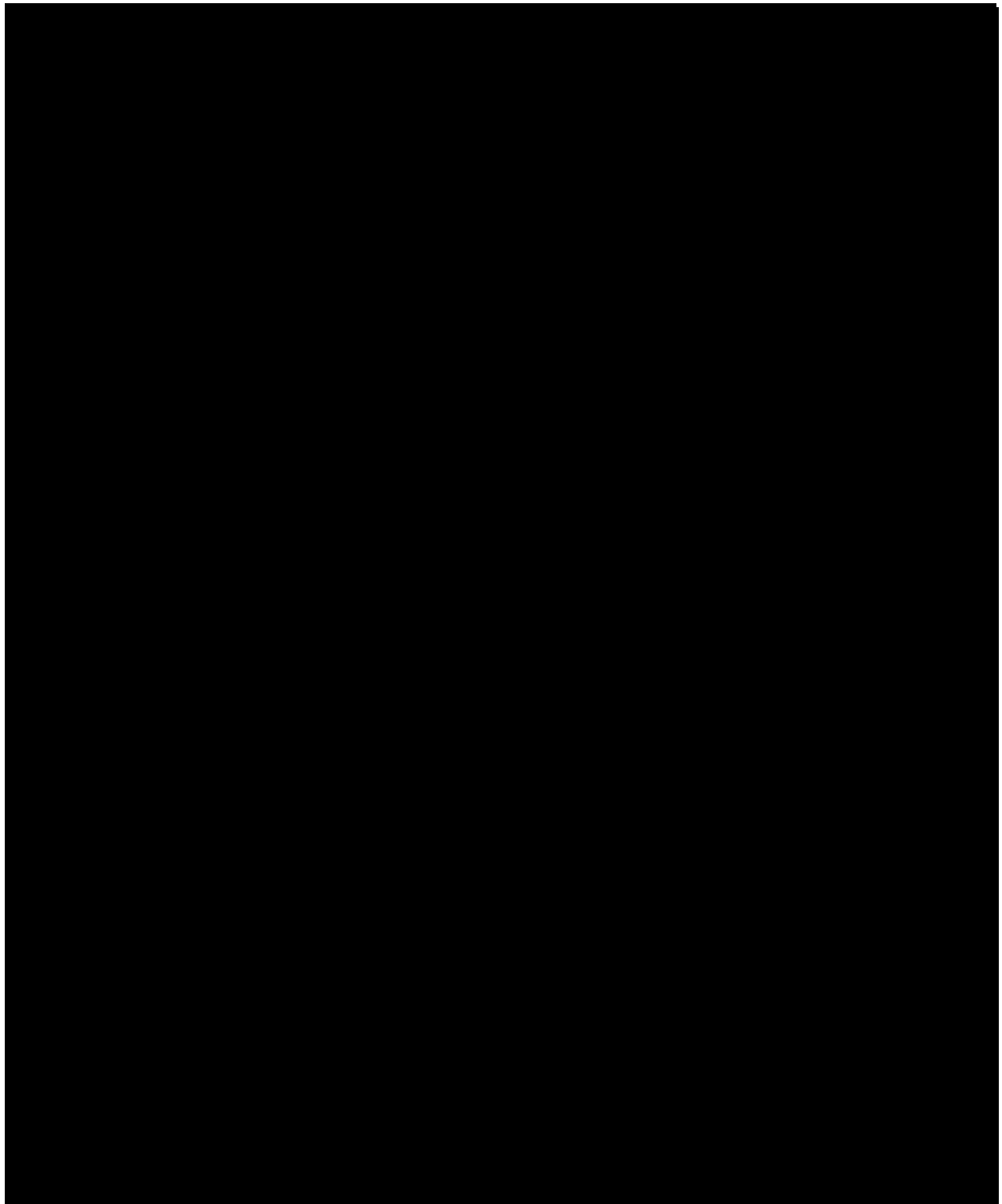
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A horizontal bar chart with 20 bars. The bars are arranged in 10 rows of two. Most bars are black, but the first bar of the 4th, 10th, and 15th rows is light gray. The bars vary in length, with the longest bars spanning most of the width and the shortest being very narrow.

Bar Index	Bar Color	Approximate Length (0-100)
1	Black	100
2	Black	85
3	Grey	10
4	Black	95
5	Black	98
6	Black	99
7	Black	99
8	Black	100
9	Black	45
10	Black	100
11	Black	100
12	Grey	10
13	Black	100
14	Black	95
15	Black	100
16	Black	98
17	Black	99
18	Black	100
19	Black	5
20	Black	100

CONCLUSION

For all of the foregoing reasons, Ms. Giuffre respectfully requests that the Court deny Defendant's motion in limine and permit her to question Defendant about her relevant alleged consensual adult activities.

Dated: March 22, 2017

Respectfully Submitted,

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² This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah for this private representation.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 22, 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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