

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
VIRGINIA L. GIUFFRE,  
Plaintiff,  
v.  
GHISLAINE MAXWELL,  
Defendant.  
-----X

**15-cv-07433-RWS**

**DEFENDANT'S MOTION IN LIMINE TO EXCLUDE EXPERT  
TESTIMONY AND OPINION OF DOCTOR GILBERT KLIMAN**

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**CONCLUSION**

As the proponent of the testimony the Plaintiff bears the burden of establishing an appropriate evidentiary basis for each and every opinion it intends to offer. The opinions violate numerous rules of evidence and must be excluded.

Ms. Maxwell requests a pre-trial hearing on this issue and that the Court issues a ruling that the opinions expressed in Exhibit A are inadmissible at trial for the above stated reasons.

Dated: January 5, 2017

Respectfully submitted,

/s/ Jeffrey S. Pagliuca

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**CERTIFICATE OF SERVICE**

I certify that on January 5, 2017, I electronically served this *Defendant's Motion In Limine to Exclude Expert Testimony and Opinion of Doctor Gilbert Kliman* via ECF on the following:

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