

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 composite pages from Defendant’s April 22 ,2016 Deposition Transcript.

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:

Sigrid S. McCawley  
Meridith Schultz  
BOIES, SCHILLER & FLEXNER, LLP  
401 East Las Olas Boulevard, Ste. 1200  
Ft. Lauderdale, FL 33301  
smccawley@bsflfp.com  
mschultz@bsflfp.com

Paul G. Cassell  
S.J. Quinney College of Law, University of  
Utah  
383 S. University Street  
Salt Lake City, UT 84112  
cassellp@law.utah.edu

Bradley J. Edwards  
FARMER, JAFFE, WEISSING, EDWARDS,  
FISTOS & LEHRMAN, P.L.  
425 North Andrews Ave., Ste. 2  
Ft. Lauderdale, FL 33301  
brad@pathtojustice.com

/s/ Nicole Simmons

Nicole Simmons