

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VIRGINIA L. GIUFFRE,

Plaintiff

Case No. 15-cv-07433-RWS

vs.

GHISLAINE MAXWELL,

Defendant

_____ /

**NON-PARTY JEFFREY EPSTEIN'S RESPONSE IN OPPOSITION TO MOTION TO
COMPEL TESTIMONY OF JEFFREY EPSTEIN**

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Plaintiff

v.

Case No. 15-cv-07433-RWS

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Defendant

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COMPEL TESTIMONY OF JEFFREY EPSTEIN**

Non-party Jeffrey Epstein, by and through undersigned counsel, hereby files this Response in Opposition to defendant Ghislaine Maxwell's Motion to Compel Testimony of Jeffrey Epstein. Defendant's Motion to Compel should be denied in its entirety. [REDACTED]

[REDACTED]

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[illegible]

1. The first step in the process is to identify the problem or issue that needs to be addressed. This involves gathering information and understanding the context of the problem.

2. Once the problem is identified, the next step is to define the objectives and goals of the project. This helps to clarify what needs to be achieved and provides a clear direction for the team.

3. The third step is to develop a plan or strategy to address the problem. This involves breaking down the problem into smaller, manageable tasks and determining the resources needed to complete each task.

4. The fourth step is to implement the plan. This involves putting the strategy into action and monitoring progress to ensure that the project is on track.

5. The final step is to evaluate the results of the project. This involves assessing the outcomes against the objectives and goals and identifying any areas for improvement.

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CONCLUSION

For all the foregoing reasons, Defendant's motion to compel should be denied in its entirety. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on all counsel of record by CM/ECF on October 17, 2016.

Respectfully submitted,
JEFFREY EPSTEIN
By his attorneys,

/s/ Jack A. Goldberger
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