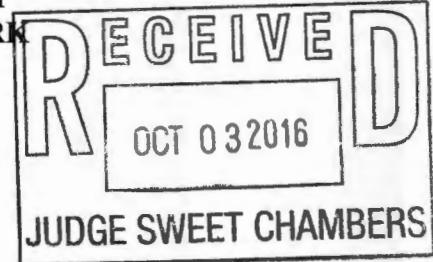


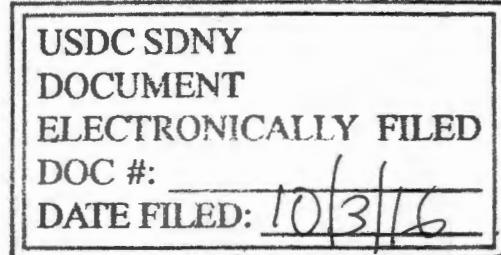
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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



15-cv-07433-RWS

AMENDED PROPOSED DISCOVERY AND CASE MANAGEMENT DEADLINES
AND REQUEST TO MODIFY PRETRIAL SCHEDULING ORDER



The Parties, through their respective counsel, propose the following discovery and case management deadlines and request that the Court enter an order modifying its Order filed October 30, 2015, ECF #13, for the following reasons:

The parties have been diligently attempting to accomplish the completion of fact discovery, the endorsement of expert witnesses, including rebuttal experts, and the scheduling of remaining fact witness, including the deposition of the Plaintiff, and at least 7, but likely 9 or 10 expert witness depositions in at least 3 states including California, Florida, and Colorado. Discovery motions are pending before this Court and the United States District Court for the Southern District of Florida, including, but not limited to, motions to compel deposition testimony of Mr. Jeffrey Epstein and other witnesses. Plaintiff obtained an Order from an English court commanding the deposition of Ross Gow in the United Kingdom. The pendency of various motions and the uncompleted and outstanding discovery issues have impacted the ability of the parties to complete fact discovery and the endorsement of expert witnesses.

The parties anticipate that there will be a significant number of legal issues that will need to be addressed prior to trial including: dispositive motions, the scope of expert testimony under FRE 702, and motions in limine. It will not be possible to adequately frame these issues until the outstanding discovery is completed.

Pursuant to this Court's Order of June 23, 2016 the parties have conferred extensively about the viability of the existing case management deadlines. The parties agree that the deadlines proposed to the Court on July 25, 2016 and approved by the Court on August 1, 2016, ECF # 317 are no longer tenable. Accordingly, subject to the Court's approval and availability the parties propose the following schedule:

The jury trial tentatively scheduled for December 12, 2016 be rescheduled to begin on March 13, 2017;

Expert Disclosures per 26(a)(2)(D) shall be made by October 28, 2016;

Expert depositions shall be concluded by November 30, 2016;

Dispositive Motions and F.R.E. 702 Motions shall be filed by January 6, 2017; responses: January 31, 2017; replies: February 10, 2017;

Initial designation of deposition testimony to be used at trial shall be made by January 13, 2017;

Objections to deposition designations shall be filed by January 27, 2017;

Counter-designations to initial deposition designations shall be made by February 3, 2017;

The Joint Pre-trial Order shall be submitted by February 10, 2017;

Objections to any counter-designations shall be made by February 17, 2017;

Motions in Limine/other motions shall be filed by February 24, 2017;

Proposed agreed upon/disputed Jury Instructions and Verdict forms shall be submitted by February 24, 2017;

Proposed jury questions shall be submitted by March 3, 2016.

WHEREFORE, the parties request that the Court adopt the proposed schedule and modify the Court's Order of October 30, 2015 to reflect the above deadlines.

Dated: September 30, 2016

Respectfully submitted,

/s/ Bradley J. Edwards

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

Attorney for Virginia Giuffre

/s/ Jeffrey S. Pagliuca

Laura A. Menninger (LM-1374)
Jeffrey S. Pagliuca (*pro hac vice*)
HADDON, MORGAN AND FOREMAN, P.C.
150 East 10th Avenue
Denver, CO 80203
Phone: 303.831.7364
Fax: 303.832.2628
jpagliuca@hmflaw.com

Attorneys for Ghislaine Maxwell

*So ordered
Sweet USAs
10-3-16*

CERTIFICATE OF SERVICE

I certify that on September 30, 2016, I electronically served this *PROPOSED DISCOVERY AND CASE MANAGEMENT DEADLINES AND REQUEST TO MODIFY PRETRIAL SCHEDULING ORDER* via ECF on the following:

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

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

Paul G. Cassell
383 S. University Street
Salt Lake City, UT 84112
cassellp@law.utah.edu

J. Stanley Pottinger
49 Twin Lakes Rd.
South Salem, NY 10590
StanPottinger@aol.com

/s/ Nicole Simmons

Nicole Simmons