

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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VIRGINIA L. GIUFFRE,

 PLAINTIFF,
V.
GHISLAINE MAXWELL,

 DEFENDANT.

15-cv-07433-RWS
Oral Argument Requested for January
7, 2016 at 12:00 pm

**DEFENDANT GHISLAINE MAXWELL’S NOTICE OF
MOTION FOR A STAY OF DISCOVERY PENDING DECISION ON
DEFENDANT’S MOTION TO DISMISS**

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law, dated November 30, 2015, including Exhibit A attached hereto, and upon all prior pleadings and proceedings in this action, other documents on file in this action, and any oral argument of counsel, Defendant Ghislaine Maxwell (“Maxwell”) will move this Court, before the Honorable Robert W. Sweet, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, Courtroom 18C, for an Order pursuant to Federal Rule of Civil Procedure 26(c) staying discovery during the pendency of Maxwell’s Motion to Dismiss.

Dated: November 30, 2015

Respectfully submitted,

s/ Laura A. Menninger

Laura A. Menninger
HADDON, MORGAN AND FOREMAN, P.C.
150 East 10th Avenue
Denver, CO 80203
Phone: 303.831.7364
Fax: 303.832.2628
lmenninger@hmflaw.com

Attorneys for Ghislaine Maxwell

CERTIFICATE OF SERVICE

I certify that on November 30, 2015, I electronically filed this DEFENDANT GHISLAINE MAXWELL'S NOTICE OF MOTION FOR A STAY OF DISCOVERY PENDING DECISION ON DEFENDANT'S MOTION TO DISMISS with the Clerk of Court using the CM/ECF system which will send notification to the following:

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

s/ Brenda Rodriguez

Brenda Rodriguez