

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X	
UNITED STATES OF AMERICA,	:	
	:	
v.	:	20 Cr. 330 (AJN)
	:	
GHISLAINE MAXWELL,	:	
	:	
Defendant.	:	
	:	
-----	X	

**DEFENDANT GHISLAINE MAXWELL'S
NOTICE OF MOTIONS IN LIMINE**

PLEASE TAKE NOTICE that, upon the accompanying memoranda and exhibits, Defendant Ghislaine Maxwell, through counsel, hereby moves the Court in *limine* to exclude certain evidence during her upcoming trial. Specifically, Ms. Maxwell hereby gives notice of her filing of the following motions:

1. Motion to Preclude the Introduction of Alleged Co-Conspirator Statements as a Sanction for Failing to Comply with This Court's September 3, 2021 Order
2. Motion to Exclude Any Evidence Offered by the Government Pursuant to Fed. R. Evid. 404(b) for Failure to Comply with the Rule's Notice Requirement;
3. Motion to Exclude Under Federal Rule of Evidence 702 and *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 U.S. 579 (1993) and Request for *Daubert* Hearing;
4. Motion to Exclude Evidence Related to Accuser-3;
5. Motion to Exclude Evidence of Alleged Flight;

6. Motion to Exclude Evidence of Ms. Maxwell's Alleged False Statements and to Redact Allegations Related to the Perjury Counts from the Second Superseding Indictment;
7. Motion to Exclude Government Exhibit 52, an Unauthenticated Hearsay Document from Suspect Sources;
8. Motion to Exclude Items Purportedly Seized During Search of 358 El Brillo Way on October 20, 2005;
9. Motion to Suppress Identification;
10. Motion to Preclude Law Enforcement Witnesses from Offering Expert Opinion Testimony;
11. Motion to Preclude Testimony About Any Alleged "Rape" by Jeffrey Epstein;
12. Motion to Preclude Reference to the Accusers as "Victims" or "Minor Victims"; and
13. Motion to Preclude Introduction of Government's Exhibits 251, 288, 294, 313 and 606.

Dated: October 18, 2021

Respectfully submitted,

s/ Jeffrey S. Pagliuca

Jeffrey S. Pagliuca
Laura A. Menninger
HADDON, MORGAN & FOREMAN P.C.
150 East 10th Avenue
Denver, CO 80203
Phone: 303-831-7364

Christian R. Everdell
COHEN & GRESSER LLP
800 Third Avenue
New York, NY 10022
Phone: 212-957-7600

Bobbi C. Sternheim
Law Offices of Bobbi C. Sternheim
225 Broadway, Suite 715
New York, NY 10007
Phone: 212-243-1100

Attorneys for Ghislaine Maxwell

Certificate of Service

I hereby certify that on October 18, 2021, I electronically filed the foregoing *Defendant Ghislaine Maxwell's Notice of Motions in Limine* with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Alison Moe
Maurene Comey
Andrew Rohrbach
Lara Pomerantz
U.S. Attorney's Office, SDNY
One Saint Andrew's Plaza
New York, NY 10007
Alison.moe@usdoj.gov
Maurene.comey@usdoj.gov
Andrew.Rohrbach@usdoj.gov
Lara.Pomerantz@usdoj.gov

s/ Nicole Simmons
