

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
[REDACTED],
Plaintiff,
v.
GHISLAINE MAXWELL,
Defendant.
-----X

15-cv-07433-RWS

**Motion To Exceed Page Limits For Reply In Support Of
Defendant's Motion To Compel**

Defendant Ghislaine Maxwell, through counsel, hereby requests that the Court permit the filing of a reply memorandum in excess of the 10 pages permitted pursuant to this Court's Practice Standard 2D. As grounds, she further avers as follows:

Defendant was forced to bring her Motion to Compel as to each and every one of Plaintiff's interrogatory responses and each and every one of her responses to the Request for Production.

The issues raised in the Motion to Compel are at once novel (Plaintiff asserts, for example, a "public interest privilege" which is unavailable to individual, non-governmental litigants) and mundane (Plaintiff completely refused to answer interrogatories, even though they comply with the Federal and Local Rules).

Because of the breadth of the issues raised, Defendant's obligations in fully and fairly responding to Plaintiff's intransigence and creative litigation tactics could not be amply be set forth in 10 pages.

Further, Plaintiff “incorporated by reference” her response to Defendant’s Motion for a Protective Order for purposes of attempting to explain her refusal to respond to proper interrogatories, thus causing her “response” to well-exceed 25 pages.

WHEREFORE, Defendant respectfully requests the Court’s indulgence in permitting an 18 page reply memoranda which is necessary to fully and fairly set forth rebuttal to Plaintiff’s Response to the Motion to Compel.

Dated: April 11, 2016

Respectfully submitted,

/s/ Laura A. Menninger

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CERTIFICATE OF SERVICE

I certify that on April 11, 2016, I electronically served this *DEFENDANT'S MOTION FOR LEAVE TO EXCEED PAGE LIMITS* via ECF on the following:

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/s/ Nicole Simmons

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