

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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██████████,

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 TO DISMISS THE COMPLAINT**

PLEASE TAKE NOTICE THAT, upon the accompanying Declaration of Laura A. Menninger, dated November 30, 2015, and the exhibits thereto and the accompanying Memorandum of Law, dated November 30, 2015, any other matters of which the Court may take judicial notice, 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 12(b)(6) dismissing the Complaint of Plaintiff ██████████ in its entirety and granting such other and further relief as the Court deems just and proper.

Dated: November 30, 2015

Respectfully submitted,

s/ Laura A. Menninger

Laura A. Menninger
HADDON, MORGAN AND FOREMAN, P.C.
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Phone: [REDACTED]

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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 TO DISMISS THE COMPLAINT 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
[REDACTED]

s/ Brenda Rodriguez

Brenda Rodriguez