

**United States District Court
Southern District of New York**

██████████,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

**PLAINTIFF'S RESPONSE TO DEFENDANT'S OBJECTION TO SUBMISSION OF
LAW ENFORCEMENT MATERIALS FOR IN CAMERA REVIEW**

Plaintiff ██████████, by and through her undersigned counsel, hereby files this Response to Defendant's Objection to Submission of Law Enforcement Materials for *In Camera* Review, and states as follows:

In her objection, Defendant Maxwell failed to cite all portions of the transcript where this Court addressed the issue of submission of law enforcement material. Specifically, in response to Defendant's demand for law enforcement documents the Court stated as follows:

"I don't know whether there are such. Is it possible that nothing in this lawsuit is clear? Well, I tried to make it clear what should be produced and what shouldn't. **Anything that has been submitted to any law enforcement officer by the plaintiff I will take in camera.** Anything other than that with respect to any law enforcement should be produced."

See McCawley Declaration at Exhibit 1, April 21, 2016 Hearing Transcript at pg. 24:1-7. Ms.

██████████ believes that her submission for *in camera* review complies with this Court's Order. To the extent the Court finds that Ms. ██████████ has misinterpreted the Court's order, Ms. ██████████

respectfully requests that the Court stay its ruling for twenty (20) days to allow Ms. [REDACTED] an opportunity to consult with others about how to proceed.

CONCLUSION

Based upon the foregoing, Ms. [REDACTED] respectfully requests that this Court overrule Defendant's objection to the submission of Law Enforcement Materials for *In Camera* Review.

Dated: May 1, 2016

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley
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CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on the 1st day of May, 2016, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I also certify that the foregoing document is being served this day on the individuals identified below via transmission of Notices of Electronic Filing generated by CM/ECF.

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/s/ Sigrid S. McCawley
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