

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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

15-cv-07433-RWS

**Declaration Of Jeffrey S. Pagliuca In Support Of Defendant's Motion In  
Limine to Exclude Expert Testimony and Opinion of Professor Terry Coonan, J.D.**

I, Jeffrey S. Pagliuca, declare as follows:

1. I am an attorney at law duly licensed in the State of Colorado and admitted to practice in the United States District Court for the Southern District of New York *pro hac vice*. I am a member of the law firm Haddon, Morgan & Foreman, P.C., counsel of record for Defendant Ghislaine Maxwell ("Maxwell") in this action. I respectfully submit this declaration in support of the Motion In Limine to Exclude Expert Testimony and Opinion of Professor Terry Coonan, J.D.

2. Attached as Exhibit A (filed under seal) is a true and correct copy of [REDACTED].

3. Attached as Exhibit B (filed under seal) are true and correct copies of [REDACTED].  
[REDACTED]  
[REDACTED]

Dated: January 5, 2017

By: */s/ Jeffrey S. Pagliuca*

\_\_\_\_\_  
Jeffrey S. Pagliuca

**CERTIFICATE OF SERVICE**

I certify that on January 5, 2017, I electronically served this *Declaration Of Jeffrey S. Pagliuca In Support Of Defendant's Motion In Limine to Exclude Expert Testimony and Opinion of Professor Terry Coonan, J.D.* via ECF on the following:

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*/s/ Nicole Simmons*  
\_\_\_\_\_  
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**REDACTED**  
**EXHIBIT A**

**REDACTED**  
**EXHIBIT B**