

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

|                           |   |                                |
|---------------------------|---|--------------------------------|
| -----                     | X |                                |
| UNITED STATES OF AMERICA, | : |                                |
|                           | : |                                |
| v.                        | : | 20 Cr. 330 (AJN)               |
|                           | : |                                |
| GHISLAINE MAXWELL,        | : | <b>NOTICE OF MOTION</b>        |
|                           | : |                                |
| Defendant.                | : | <b>ORAL ARGUMENT REQUESTED</b> |
|                           | : |                                |
| -----                     | X |                                |

**DEFENDANT GHISLAINE MAXWELL'S NOTICE OF MOTION UNDER THE DUE  
PROCESS CLAUSE TO SUPPRESS ALL EVIDENCE OBTAINED FROM THE  
GOVERNMENT'S SUBPOENA TO BOIES SCHILLER AND TO DISMISS COUNTS  
FIVE AND SIX  
(Pretrial Motion # 3)**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law and exhibits, Defendant Ghislaine Maxwell, through counsel, respectfully moves to suppress under the due process clause all evidence obtained from the government's subpoena to Boies Schiller and to dismiss Counts Five and Six.

Dated: January 25, 2021  
New York, New York

Respectfully submitted,

*s/ Jeffrey S. Pagliuca*

---

Jeffrey S. Pagliuca

Laura A. Menninger

HADDON, MORGAN & FOREMAN P.C.

[REDACTED]

Denver, CO 80203

Phone: [REDACTED]

Mark S. Cohen

Christian R. Everdell

COHEN & GRESSER LLP

[REDACTED]

New York, NY 10022

Phone: [REDACTED]

Bobbi C. Sternheim

Law Offices of Bobbi C. Sternheim

[REDACTED]

New York, NY 10011

Phone: [REDACTED]

*Attorneys for Ghislaine Maxwell*