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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

In re: SUBPOENA TO BRADLEY J.
EDWARDS

Underlying case:

VIRGINIA L. GIUFFRE, Plaintiff

v.

GHISLAINE MAXWELL, Defendant

No. 15-cv-07433-RWS (S.D.N.Y.)

**NOTICE OF STATUS OF SUBPOENA
DUCES TECUM AND RELATED
RULINGS IN UNDERLYING ACTION**

Case Number 0:16-mc-61262-JG

Defendant Ghislaine Maxwell (“Ms. Maxwell”) files this notice of her position respecting the *Subpoena Duces Tecum* to Bradly Edwards and a Related Ruling in the underlying Action, and the Status of outstanding Requests for Production and the Motion to Quash, stating as follows:

1. The Court should be advised that in addition to the *Subpoena Duces Tecum* served on Bradly Edwards (“Mr. Edwards”) which is the subject of the pending Motion to Quash, Ms. Maxwell served a similar, although not identical, *Subpoena Duces Tecum* on one of Plaintiff Virginia Giuffre other attorneys, Paul Cassell (the “Cassell Subpoena”), Ex. A.
2. Mr. Cassell, like Mr. Edwards, moved to quash. The District Court for the District of Utah transferred the Motion to Quash to the Southern District of New York where the underlying action is pending.
3. The Court presiding over the underlying action in the Southern District of New York issued a ruling on the Cassell Motion to Quash on August 30, 2016, attached hereto as Ex. B.
4. Certain of the requests for production in the Cassell Subpoena are identical to the Request for Production to Mr. Edwards, which is subject to the Motion to Quash in the matter. It is Ms. Maxwell’s position that the rulings made by the Court in the Southern District of New York are *res judicata* on the Edwards Subpoena with respect to the identical requests in the Cassell Subpoena, and binding Mr. Edwards and Ms. Maxwell. For the Court’s convenience, the following is a table of the questions that are identical as between the Edwards Subpoena and the Cassell Subpoena, and the Court’s ruling on each in the Southern District of New York.

| Cassell Subpoena – Request No. | Edwards Subpoena Request No. | Southern District of New York Ruling |
|---------------------------------------|-------------------------------------|---|
| Request 1 | Request 1 | Motion to Quash Denied – Production Required |
| Request 2 | Request 2 | Motion to Quash Denied – Production Required |
| Request 3 | Request 6 | Motion to Quash – Granted |
| Request 4 | Request 7 | Motion to Quash – Granted (request withdrawn) |

| | | |
|------------|------------|--|
| Request 5 | Request 8 | Motion to Quash – Granted (request withdrawn) |
| Request 6 | Request 9 | Motion to Quash – Granted (request withdrawn) |
| Request 7 | Request 10 | Motion to Quash Denied – Production Required |
| Request 8 | Request 11 | Motion to Quash Denied – Production Required |
| Request 9 | Request 13 | Motion to Quash – Granted |
| Request 10 | Request 14 | Not Contested – Production Required |
| Request 11 | Request 15 | Motion to Quash – Granted |
| Request 12 | Request 16 | Not Contested – Production required |
| Request 13 | Request 17 | Not Contested – Production Required |
| Request 14 | Request 18 | Not Contested – Production Required |

5. Based on the forgoing, Ms. Maxwell believes that the Court Should issue an Order consistent with the binding determinations of the Court in which the underlying case is pending on identical issues.

- a. Denying the Motion to Quash Request Numbers 1, 2, 10 and 11 and require Production of documents within 14 days of the Order¹;
- b. Granting Motion to Quash 6, 7, 8, 9, 13 and 15; and
- c. Requiring Production of the Non-Contested Requests for production, Request Numbers 14, 16, 17 and 18 within 14 days of the Order.

6. The case remains active and is scheduled for trial in March 2017. Ms. Maxwell requests that the Court deny the Motion to Quash on the remaining outstanding Requests for Production, Requests 3, 4, 5, 12, 19 and 20 for the reasons set forth in the Response to the Motion to Quash.

¹ Ms. Maxwell does not seek a second production of documents that have already been produced in this matter, including those already produced third parties Mr. Cassell or Victims Refuse Silence.

Date: December 16, 2016

Respectfully submitted,

/s/ Denise D. Riley

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CERTIFICATE OF SERVICE

I hereby certify that on December 16, 2016, I electronically filed the foregoing *Notice of Status of Subpoena Duces Tecum and Related Rulings in Underlying Action* with the Clerk of Court using the CM/ECF system which sent notification of such filing to the following:

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/s/ *Nicole Simmons*
