

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

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

_____ /

PLAINTIFF, VIRGINIA L. GIUFFRE'S NOTICE OF SUPPLEMENTAL AUTHORITY

In further support of her Opposition to Defendant's Motion to Dismiss the Complaint, Plaintiff Virginia L. Giuffre, by and through her undersigned counsel, respectfully submits the recent decision in *Green v. Cosby*, 3:14-cv-30211-MGM, 2015 WL 5923553 (D. Mass., Oct. 15, 2015) ("*Cosby*") (attached as Exhibit A).

In *Cosby*, the court denied Bill Cosby's motion to dismiss the sexual assault victim's defamation complaint, holding that Cosby's "suggestion that Plaintiff intentionally lied about being sexually assaulted" could expose plaintiff to "scorn or ridicule," and, therefore, Cosby's statement could be found to have a "defamatory meaning." *Green v. Cosby*, No. CV 14-30211-MGM, 2015 WL 5923553, at *11 (D. Mass. Oct. 9, 2015).

The *Cosby* decision is relevant to arguments advanced by Defendant in support of her motion to dismiss, and therefore, Plaintiff respectfully requests that the Court take notice of this supplemental authority.

Dated January 8, 2015

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 8, 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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