

**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 RESPONSE
TO DEFENDANT'S NOTICE OF SUPPLEMENTAL AUTHORITY**

In response to Defendant's Notice of Supplemental Authority [D.E. # 29], Plaintiff Virginia L. Giuffre, by and through her undersigned counsel, respectfully states as follows:

As recounted by Defendant's Notice of Supplemental Authority, the *Hill* Court found that Cosby's statements were not defamatory because they did not "lead to an inference that Plaintiff is a 'liar and an extortionist.'" In vivid contrast, Maxwell called Ms. Giuffre's assertions of sexual abuse "obvious lies." It is axiomatic that a person telling "obvious lies" is a liar, and, therefore, the reasoning employed by the *Hill* court is inapplicable to the statements made by Maxwell.

Dated January 25, 2015

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 25, 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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