

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SARAH RANSOME,

Plaintiff,
v.
JEFFREY EPSTEIN, GHISLAINE
MAXWELL, SARAH KELLEN, LESLEY
GROFF, and NATALYA MALYSHEV,

Defendants.

17-cv-00616-JGK

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NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law and Declaration of Laura A. Menninger (with exhibits), Defendant Ghislaine Maxwell will move the Court, pursuant Rules 8, 9(b), and 12(b)(2) and (6), and 12(f) of the Federal Rules of Civil Procedure, and before the Honorable John G. Koeltl, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, as soon as counsel may be heard, for an Order (1) granting Ms. Maxwell's Motion to Dismiss the Amended Complaint, (2) striking portion of the Amended Complaint if the Motion to Dismiss is not granted and (3) any other relief the Court deems just and proper.

Dated: Denver, Colorado
March 13, 2018.

Respectfully submitted,

/s/ Laura A. Menninger

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To: Counsel of Record for All Parties