

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, :
: 20 Cr. 330 (AJN)
v. :
: NOTICE OF MOTION
GHISLAINE MAXWELL, :
: ORAL ARGUMENT REQUESTED
Defendant. :
:
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**DEFENDANT GHISLAINE MAXWELL'S NOTICE OF MOTION TO DISMISS
COUNTS FIVE AND SIX OF THE SUPERSEDING INDICTMENT BECAUSE THE
ALLEGED MISSTATEMENTS ARE NOT PERJURIOUS AS A MATTER OF LAW
(Pretrial Motion # 4)**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law and exhibits, Defendant Ghislaine Maxwell, through counsel, hereby moves to dismiss Counts Five and Six of the Superseding Indictment because the alleged misstatements are not perjurious as a matter of law.

Dated: January 25, 2021
New York, New York

Respectfully submitted,

s/ Jeffrey S. Pagliuca

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