

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----	X	
UNITED STATES OF AMERICA,	:	
	:	
v.	:	20 Cr. 330 (AJN)
	:	
GHISLAINE MAXWELL,	:	<b>NOTICE OF MOTION</b>
	:	
Defendant.	:	ORAL ARGUMENT REQUESTED
-----	X	

**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*

---

Jeffrey S. Pagliuca  
Laura A. Menninger  
HADDON, MORGAN & FOREMAN P.C.  
150 East 10th Avenue  
Denver, CO 80203  
Phone: 303-831-7364

Mark S. Cohen  
Christian R. Everdell  
COHEN & GRESSER LLP  
800 Third Avenue  
New York, NY 10022  
Phone: 212-957-7600

Bobbi C. Sternheim  
Law Offices of Bobbi C. Sternheim  
33 West 19th Street - 4th Floor  
New York, NY 10011  
Phone: 212-243-1100

*Attorneys for Ghislaine Maxwell*