

EXHIBIT 2

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

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

PLAINTIFF'S RE-NOTICE OF TAKING VIDEOTAPED DEPOSITION

PLEASE TAKE NOTICE THAT, pursuant to Rule 30 of the Federal Rules of Civil Procedure, counsel for Plaintiff, Virginia Giuffre, will take the deposition of the below-named individual on the date and hour indicated.

NAME: Ghislaine Maxwell
DATE AND TIME: March 25, 2016 at 9:00 a.m.
LOCATION: Boies Schiller & Flexner, LLP
575 Lexington Ave., 7th Floor
New York, NY 10022

The videotaped deposition will be taken upon oral examination before Magna Legal Services, or any other notary public authorized by law to take depositions. The oral examination will continue from day to day until completed.

The video operator shall be provided by Magna Legal Services. This deposition is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the rules of this Court.

Dated: February 22, 2016

By: /s/ Sigrid McCawley
Sigrid McCawley
(Pro Hac Vice Pending)

Boies Schiller & Flexner LLP
401 E. Las Olas Blvd., Suite 1200
Ft. Lauderdale, FL 33301
(954) 356-0011

David Boies
Boies Schiller & Flexner LLP
333 Main Street
Armonk, NY 10504

Ellen Brockman
Boies Schiller & Flexner LLP
575 Lexington Ave
New York, New York 10022
(212) 446-2300

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on the 22nd day of February, 2016, I served the attached document PLAINTIFF'S RE-NOTICE OF TAKING VIDEOTAPED DEPOSITION OF DEFENDANT GHISLAINE MAXWELL via Email to the following counsel of record.

Laura A. Menninger, Esq.
HADDON, MORGAN & FOREMAN, P.C.
150 East 10th Avenue
Denver, Colorado 80203
Tel: (303) 831-7364
Fax: (303) 832-2628
Email: lmenninger@hmflaw.com

/s/ Sigrid S. McCawley

Sigrid S. McCawley