



January 5, 2024

VIA ECF

The Honorable Loretta A. Preska
District Court Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: ***Giuffre v. Maxwell, Case No. 15-cv-7433-LAP***

Dear Judge Preska,

Pursuant to the Court's December 18, 2023, unsealing order, and following conferral with Defendant, Plaintiff files this set of documents ordered unsealed. The filing of these documents ordered unsealed will be done on a rolling basis until completed. This filing also excludes documents pertaining to Does 105 (*see* December 28, 2023, Email Correspondence with Chambers), 107, and 110 (*see* ECF No. 1319), while the Court's review of those documents is ongoing.

Respectfully,

/s/ Sigrid S. McCawley
Sigrid S. McCawley

cc: Counsel of Record (via ECF)

EXHIBIT 9
(File Under Seal)

1 START TIME: 8:57 a.m.

2 THE COURT REPORTER: Do you declare under
3 penalty of perjury to tell the truth, the whole
4 truth, and nothing but the truth?

5 THE WITNESS:

6 THE VIDEOGRAPHER: In the mart /O*F
7 Virginia L Jeffrey verses Ghislaine Maxwell.
8 Today's date June 24, 2016, and time is
9 8:59 a.m. this is videotaped deposition of Tony
10 Figueroa. Counsel please truce /THEFL after
11 which the court reporter will swear in the
12 witness.

13 MR. EDWARDS: Brad adards I represent
14 Virginia Giuffre. And Virginia Giuffre is here
15 with me as well.

16 MS. MENNINGER: Laura manager on behalf of
17 gelen Maxwell, the Defendant. She is not here.
18 (Off the record at 9:01 a.m.).

19 A Yes.

20 MS. MENNINGER:

21 Q Good morning?

22 A Good morning.

23 Q Can you state your full name and spell
24 your last name for the record?

25 A My name is Anthony Lewis Zach Figueroa

1 /EUFPPB 2001?

2 MS. MENNINGER: /TPOPBLGZ form /TPOUPBLZ.

3 A No.

4 Q How do you know that?

5 A Because she did not have a job anywhere
6 else.

7 Q How frequently during that period of time
8 would she be going over to Jeffrey epistipes house?

9 MS. MENNINGER: Object to the form
10 foundation.

11 A When I was with her she would go over
12 there two weeks out of every month.

13 Q And how often what is the frequency you
14 would be the person take her to his house?

15 MS. MENNINGER: /TPOPBLGZ form /TPOUFRPZ.

16 A Pretty much whenever she was leaving to go
17 on a trip I would drive her there.

18 BY MR. EDWARDS:

19 Q Times when she went therein during the day
20 and came back that night?

21 A Yes.

22 Q And would you be the person that drove her
23 on those occations too?

24 A No.

25 Q She would drive herself on those

1 occasions?

2 A Yeah.

3 Q Were there times when you drove her to the
4 airport, the private airport?

5 A The private airport I picked her up from.
6 I never drove her there.

7 Q Did you see epi/SPA0EPB airplane at the
8 airport?

9 A Yes.

10 Q What did it look like?

11 A Object form.

12 A A big black leer jet I guess it was. I
13 don't know. It was a pretty nice black jet.

14 Q Did you observe Virginia entering or
15 exiting that airplane?

16 A Yes.

17 Q And other than Virginia what other people
18 did you observe entering or exiting that airplane?

19 A I'm pretty sure Jeffrey and Ms. Maxwell
20 were both there.

21 Q Can you tell me the first time that you
22 met Ms. Maxwell. Describe that occasion?

23 A Like I said we were just pretty much I was
24 in the house hang out and she was in the kitchen she
25 was there one of the times I guess. And pretty much

1 Q How many times did you go to Jeffrey
2 epi/STAOEPBZ pool area?

3 A Like three times.

4 Q And on the three occasions that you went
5 to Jeffrey epi/STAOEPBZ pool area who else was by
6 had pool parea?

7 A I understand nobody like I was liltry just
8 sitting out there by myself waiting for her to get
9 done talking with him. But pretty much everytime I
10 was at that house there was just random girls the
11 chef and Ms. Maxwell.

12 Q At this time in 2000 one your how old are
13 you. What is your date of birth?

14 A March 4th 1982. I'm 34.

15 Q Okay. So in 2001 you about 19?

16 A Yeah.

17 Q When you were at Jeffrey epi/STAOEPBZ
18 house and by the pool?

19 A Uh-huh.

20 Q I your describing other girls that were in
21 had house did youknow these other hours?

22 A No they were like fraught different
23 countries.

24 Q Hoe did you know they waere from different
25 contries?

1 A Because whenever they would talk or I
2 would hear them say blah blah or she would tell me
3 this girl was this place and that girl was thaw that
4 place.

5 Q Would could tell from the accent?

6 A Yeah.

7 Q Would you ever talk to these girls?

8 A Not really. I mean sometimes I would.
9 But not like a conversation about asking what they
10 were doing ear.

11 Q At this time 19 years old. Can you tell
12 me what the age range of these girls you describing
13 that are foreign girls at Jeffries house?

14 MS. MENNINGER: Objection form
15 /TPAUFRPBGZ.

16 A They looked about Virginia's age. They
17 all looked about that about 17, 18. But I don't
18 know. I did not ask hem how old they were so I
19 don't know the exact number.

20 BY MR. EDWARDS:

21 Q Okay. And when you were in the house by
22 the pool by yourself you said Virginia was just I
23 guess describing one occasion Virginia was just talk
24 to them?

25 A Jeffrey I don't know about what.

1 Q Was Ms. Maxwell the?

2 A I'm not sure I know she was only there 5
3 or six times out of the whole time I was with her
4 that I met her.

5 Q All right. And each of the five or six
6 times that you met Ms. Maxwell do I understand it
7 correctly that it was inside Jeff sephouse?

8 A Yes.

9 Q Each of the 5 or six times that you met
10 Ms. Maxwell inside of Jeffrey's house was your
11 conversation with her always fairly similar stoowhat
12 you described?

13 A Yeah, it was never like I never talked to
14 her as I would like Jeffrey. Like she never set
15 down with me I had a conversation 0 high how you
16 doing blew blew ahow doing and that would be it.

17 Q Okay.

18 Q And when St. The first time you met
19 Jeffrey Epstein in relationship the the first time
20 you met Ms. Maxwell. Meaning did you meet him
21 first. Second?

22 A I met Jeffrey first.

23 Q How did how were you introduced to Jeffrey
24 Epstein?

25 A Just high this is Jeffrey this is Tony,

1 you know, just casually.

2 Q When is the first time that you were asked
3 by anyone to bring other girls Jeff /AEF
4 epi/STAOEPBZ house?

5 A Pretty much right after she left. When
6 she would go on trips. They would just ask me if I
7 would find like Jeffrey would say when you get back
8 find more girls to have here blue blue this and
9 that. And then after she went to thiland when he
10 was calling me searching for her he would throw that
11 in there randomly do you have any girls. And then
12 where is Virginia at. Like trying to seem like he
13 was trying to get more information about her than
14 anything after she left but make it seem like still
15 wanted me to be around kind of.

16 Q Okay.

17 A But I don't know exactly.

18 Q Okay. So in the beginning?

19 A Uh-huh.

20 Q Of your going over to Jeffrey Epstein
21 house primary it was just you and Virginia?

22 A Yeah, .

23 Q At someintp point in time Virginia starts
24 recruiting other girls to go to the house; is that
25 right?

1 Q Describe for us what these girls looked
2 like that were being brought to the house?

3 MS. MENNINGER: Object to the form found
4 vague time to place.

5 BY MR. EDWARDS:

6 Q Sorry let me prephrase the question during
7 this 2001 period if you were driving Virginia and
8 another girl to the house, what type of girls would
9 you be driving?

10 MS. MENNINGER: Form form foundation.

11 A Pretty much like young looking teenager
12 girls 16, 17, really pretty.

13 Q How did you know that's what was being
14 requested that that age range and that look and?

15 A I just assumed that that's what most guys
16 are into.

17 Q Girls that looked like Virginia?

18 A Yeah.

19 Q When you would bring girls over to the
20 house were you looking for some sort of professional
21 mussuese or massge experience?

22 A Just get friends that I knew from school.

23 Q And that's what Jeffrey wanted?

24 A Yeah.

25 MS. MENNINGER: Object form founds.

1 BY MR. EDWARDS:

2 Q How did you know what Jeffrey wanted?

3 A That's what he asked me.

4 Q What would he ask you?

5 A Ask me to try to find girls a resem
6 believed like somewhat that type.

7 Q And when you would bring these girls that
8 resem believed Virginia or some type would Jeffrey
9 Epstein pay you?

10 A Yes cension form /STKPWHROUPBGZ.

11 Q Would Jeffrey pay you every time?

12 A Ojbection form foundation.

13 A Yes.

14 Q And how much would he pay you foreach girl
15 that you brought to him?

16 A Object form founds.

17 A Two hundred dollars apiece.

18 Q Where would this transaction tace place?

19 A Object to the form.

20 MS. MENNINGER: Object to the form

21 /TPOUFRPBLZ the living room.

22 BY MR. EDWARDS:

23 Q And how much money do you think overall
24 Jeffy epistein paid you for bringing girls to him?

25 A Me personal or us together.

1 Q Sure. How how often did Jeffy Epstein ask
2 you to bring girls to the house?

3 A Pretty much as much as possible like he
4 would tell us as men girls we could bring the
5 better, so...

6 Q When you say us who are the us?

7 A Me I Virginia.

8 Q So walking me through an example of that
9 you would go thohouse with Virginia and describe
10 what would happen that ultimately let to this
11 conversation that you just describe would Jeff /AEF
12 Epstein?

13 A Well because /THRAOEU explain that.

14 Q Sure you I Virginia my initial question
15 was I think you initial answer was is as often
16 Jeffrey bring girls to him as muffin as possible as
17 many osto us. Us being you I Virginia. So walk ame
18 through an example go thohouse and then where do you
19 have this discussion where did you have this
20 discussion what words did he use what did he tell
21 you specifically?

22 A Specifically he just said see if you can
23 find firls. It was in the living room. There's a
24 little desk that is where I normally talk to him. He
25 would sit behind the so you have any nor girls you

1 want to beak in a cupp for nis weekend and like I
2 said pretty much every time I went there if I knew
3 /KPWEBLS I could bring to him I started bring ilto I
4 guessee liked then they would start doing stuff
5 without me so then slowy just fading out, you know.

6 Q Squat this point Jeffrey Epstein in the
7 living room and Virginia to bring other girls?

8 A Uh-huh.

9 Q Was he using the world massage anymore?

10 A No, ee did not say anything like that just
11 is saying to bring them.

12 Q At that stage where this conversation a
13 happening dud you already settle conversation and
14 Virginia you knew what was actually at the house as
15 apoid I'ma masagge therapist?

16 A I'm not positive but I don't doubt it.

17 Q Once you were hin house with Virginia and
18 you were having these conversation with Jeffy
19 Epstein was it obviously to you whata happening that
20 house?

21 A I mean it was obvious to me. Like I said
22 I never witnesses any of the stuff so...

23 Q Of course?

24 Q What would you tell the girls that you
25 would bring to Jeffrey's what the did you del the

1 Jeffries house to get them to the house.

2 A Well I told them that it was for a
3 massage. And I told them obviously that if people
4 when they get massaged I don't know going to expect
5 more from you or not. If he does tell him know it's
6 up to you if you want to go. And they would still
7 do it it.

8 Q How did you know to use the word massage
9 to get the girls to Jeffrey epi/STAOEPBZ house?

10 A I did not want to straight up be like why
11 don't you jerk this guy off for money so...

12 Q You thought that was a better way to get
13 them to the house?

14 A Yeah, sounded a little bit more
15 professional aguess not as bad.

16 Q Okay.

17 Q When you brought other girls to the house
18 aside from Virginia where was elenmax in the house?

19 A Object form /STKPWHROUPBZ brought other
20 girls to the house aside from Virginia was
21 Ms. Maxwell in the house?

22 A Yes.

23 Q Where was Ms. Maxwell in the house when
24 you brought other girls to the house aside from
25 Virginia?

1 A In the kitchen.

2 Q And on these occasions would you see
3 Ms. Maxwell in the kitchen?

4 A Yes.

5 Q On these occasion when you would bring
6 girls other the Virginia to the house and
7 Ms. Maxwell was in the kitsch would Ms. Maxwell see
8 the girl you brought to the house?

9 A Yes.

10 A Form foundation.

11 Q And when you would brink these girls other
12 than Virginia to Jeff /AEF epi/STAOEPBZ house I see
13 Ms. Maxwell in the kitchen were you with the girl
14 that you just brought?

15 A Yes.

16 MS. MENNINGER: /TPOPBL form foun.

17 BY MR. EDWARDS:

18 Q I during these occasion what conversation
19 if any did Ms. Maxwell have knyefe girls you
20 brought?

21 A Not much pretty mump like I said when I
22 take the girls all it would just a friendly
23 conversation with everybody and just high what's
24 your name asking about what they do and where they
25 are and stuff like that. It was never anything like

1 sexual talk or anything like that.

2 Q Okay. So just so have a good image of that
3 bring a girl authority when you brought a other than
4 verge into -- what door did you enter Jeffrey
5 Epstein's house?

6 A When you pull up to his house a walkway
7 where higarage is like off to the side that's the
8 bay I always go.

9 Q I know the sider door by the kitchen?

10 A Yeah.

11 Q So on one of occasions if you can think to
12 one of the occasion brought a girl into the kitchen
13 other than Virginia?

14 A Uh-huh.

15 Q And Ms. Maxwell an in the kitchen, did you
16 and this /OEURT girl that you were bringing over sit
17 there and together have this small stalk and
18 McMaxal?

19 A Yeah.

20 MS. MENNINGER: Fom form foundation.

21 A Yes.

22 Q And how long would you and one of these
23 other girls sit there and have this small talk with
24 Ms. Maxwell?

25 A No more than 10 or 15 minutes.

1 Q What were you waiting for?

2 A Pretty much her to take them up stairs
3 then I would leave. I would wait for them to be
4 like we're ready. And I would be all right. See you
5 later and I would leave.

6 Q You were waiting for who to take who up
7 stairs?

8 A I had seen Ms. Maxwell take a girl up
9 there well not up there visibly but I watched her
10 leave had room with one.

11 Q Up stairs?

12 A Well, I didn't see the stairs. Like in
13 the kitchen there's not like you have to go all
14 around and all that shit.

15 Q Let me just understand what you did see
16 then. So you brought a girl over. We're talking
17 about an instance where you brought another girl
18 over to the house?

19 A Yes.

20 Q And your in the kitchen with this other
21 girl and Ms. Maxwell?

22 A Yes.

23 Q And what did you actually see in terms of
24 of where did that girl and with whom?

25 A I just saw them leave the room.

1 Q Together?

2 A Together. And assumed that they were
3 heading up to massage room.

4 Q Because that was the purpose of bringing
5 her over?

6 MS. MENNINGER: Objection.

7 A Yeah.

8 MS. MENNINGER: Form founds.

9 BY MR. EDWARDS:

10 Q When during that circumstance?

11 Q So you understand the circumstance I'm
12 talking about you bring a girl into the kitchen and
13 Ms. Mackle is in the kitchen?

14 A Uh-huh.

15 Q And you see Ms. Maxwell and this girl
16 leave the kitchen?

17 A Yes.

18 Q When during that circumstances do you get
19 paid?

20 A I did paid before anything happens period.
21 I walk in the door talk to Jeffrey and then he hands
22 me my money walk back to kitchen say by and leave.
23 And then like I said at some point and seen her
24 before when I was leave walking the girl out the
25 living room out through the kitchen. So she could

1 have taken up stairs she could have not but I
2 definitely seen her walking.

3 Q On how many occasionings?

4 Q /KWROPBLT might I told me this but how
5 many occasion did you bring girls into the kitchen
6 and the three of you, you the girl you brought and I
7 /STKPWEULian Maxwell have conversation?

8 A Not many. I only met her maybe six times.

9 Q Each of the times you met gillian Maxwell
10 in Jeffrey epi/STAOEPBZ house did you have girls
11 that were being brought to Jeffrey?

12 A Everything time at the house it was either
13 with Virginia or some girl. I never went there by
14 myself.

15 Q He did not have a use for you?

16 A Yeah, he did not need me.

17 Q All right. That beginning of the
18 deposition I believe tell me if I got this wrong I
19 believe talk about it time Virginia just gone to
20 thiland talking to you in telephone?

21 A Uh-huh.

22 Q And you believe Jeff /AEF was supposed to
23 pay the phone bill; is that correct?

24 A Yeah.

25 Q Why did you believe Jeffrey Epstein was

1 lead to where is she, so...

2 Q How did Jeffrey Epstein have you telephone
3 number?

4 A I would imagine from Virginia.

5 Q Okay. What prior to her going did he call
6 you on the telepone?

7 A I mean sometimes he would have his
8 assistant call thee but he did call me sometimes.

9 Q Which assistant call you of jiffy
10 sep/STAOEFRPBZ I can't remember her name but his
11 main asigh?

12 Q Would sarah callin cal lyou?

13 A I believe that's her.

14 Q Gillian Maxwell call you?

15 A I think she might have once or twice.
16 I'm not positive but I'm pretty sureee did.

17 Q Would the calls that gill wherein Maxwell
18 made to you been during the time that you were
19 living with Virginia or after Virginia had left?

20 A It was while living together.

21 Q And what would be what did Virginia what
22 did gillian Maxwell say to you when she called you
23 while living?

24 A

25 MS. MENNINGER: Objection miscontact when

1 watt.

2 A And what say what did he say?

3 Q Yes.

4 A Just ask mead had anybody else lined up.

5 Q Anything else lined up for what?

6 A Objection form /TPOUFRPBLDZ.

7 A For Jeffrey.

8 Q Let me fix this. Gill when gillian
9 Maxwell would call you during the time that you were
10 living with Virginia she would ask you what
11 specifically?

12 MS. MENNINGER: Fom form foundation.

13 A Just if I had found any ear girls just to
14 bring the Jeffrey.

15 Q Okay.

16 A Pretty much everytime a conversation with
17 any of them it was either asking Virginia where she
18 was ask the asking her to get girls or asking me get
19 girls.

20 Q Let's go to that second categoring you
21 just identified asking Virginia to get girls. How
22 many times were you in a room where specifically
23 gill max would ask Virginia to bring girls?

24 A Not that I can recall.

25 Q How many times when you say thigh asked

1 Q How often would Virginia according to
2 Virginia how much would Virginia and /PH*BGS maxal
3 go out look forg girls?

4 A I stopped asking after a while. I would
5 imagine every time but I don't recall.

6 A Every time when she was telling you or you
7 were asking that's what was happening.

8 A Yeah.

9 Q All right. And going back to when he
10 finally told you that having sex with these people?

11 A Uh-huh.

12 Q It was the people she told you that she
13 was having sex with Jeffp /STAOEPB Ms. Mackual
14 andthol other girls did you understand all the other
15 girls were?

16 A I just assumed justthol girls that heever
17 had at his house I never on a personal basis with
18 pretty much anyone except for the ones I went to
19 school with so...

20 Q And?

21 Q Of the girls brought to had us or that you
22 observed Virginia bring to the house how many of
23 them were professional masuesses?

24 A Zero.

25 Q What was the age range of the girls that

1 you start with you that you brought with Jeffy
2 Epstein. Object to the form foundation?

3 A Well had age-age brought for sure were
4 around my age. I met them through school people
5 where knew actually hung out with.

6 Q What were the age range of the girls your
7 observe thad Virginia brought to the house?

8 MS. MENNINGER: Object to the form
9 foundation.

10 A I like I said I never asked them how old
11 they all seemed like there were younger.

12 Q Are you bring you bring 253540 year olds
13 to the house?

14 A No.

15 Q So within a range?

16 A I'd say probably 16 to 19.

17 Q Okay.

18 MS. MENNINGER: /TPOPBLG /TPORP foundation
19 sore slipping it in afterwards but...

20 BY MR. EDWARDS:

21 Q Yousaid when you were at the house you saw
22 naked photos what is the naked photo?

23 A Pictures of people naked.

24 Q Photohad ezpeople that were faked?

25 A Yeah.

1 /STKRAUP /UPD some a/KAEUZsiobe the inside.

2 A Yes.

3 Q Hung out the by had pool?

4 A Yes.

5 Q On the /KWEUFPB?

6 A Yes? And in total of the times you went
7 if soohad house you saw Ms. Maxwellout gut tall ix.

8 A Five or six times.

9 Q Total?

10 A Tote.

11 Q Not fix?

12 A /PAOERLD all together.

13 Q /WROU brought?

14 A All together period.

15 Q I thought you said asking you questions
16 that Ms. Maxwell ever Jude bring girls?

17 A I don't remember saying had a.

18 Q Tell me when did Ms. Macual ask row to
19 bring a girl?

20 A Never /EUFRP person like liltally on it
21 phone once or twice.

22 Q Did Ms. Maxwell call you /TPR-BGSly?

23 A No.

24 Q How many times do you think Ms. Mackle?

25 A Ever just a few couple times onceoy twice.

1 Q /PHUPLG ort of /TAOEUFPL pretty much his
2 assistant?

3 Q How do you know /PH*GS Maxwell's voice?

4 A Sounds British.

5 Q So-so someone British acthe /SHAOEFRPBLG
6 told me who she was?

7 Q And what did see say wheni called you
8 asked you to bring gills?

9 A High a gillian Jeffy wandering had anybody
10 to could come /STKPWHROEFRB when did that happen.

11 A I'm not exactty shirr of time /TPRAEUFPL.

12 Q After the road house grillo /PW-F?

13 A Probably I would think before I'm pretty
14 sure pretty positive.

15 Q /TPWH-FR /HOED house grill wray?

16 A After started going back to work with
17 Jeffrey /STAUPLD talking to her went back to him I
18 never Todd to Ms. Mackual again after the had to
19 been before that.

20 Q When /TKPEUD you stop talking to?

21 A Just /TWAOEPTB there never like she was
22 anything more than a high how are you kind a thing
23 not like when I talked to Jeffy ask me about stuff
24 and hold an information with her just hay hours your
25 mom see yeah not anything detail.

1 A /HRO*EUTSeredered not like debate that.

2 Q So you waiver reading it if you like all
3 right. Thank you very much for you time?

4 (Off the record at 1:23 p.m.) order order.

5 MS. MENNINGER: Orderered.

6 BY MS. MENNINGER:

7 Q

8 MR. EDWARDS: Yeah I wand a copy.

9 Cology dense said. /EUFPLTS disc

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

Exhibit 1

BOIES, SCHILLER & FLEXNER LLP

401 EAST LAS OLAS BOULEVARD • SUITE 1200 • FORT LAUDERDALE, FL 33301-2211 • PH. 954.356.0011 • FAX 954.356.0022

Meredith L. Schultz, Esq.
E-mail: mschultz@bsfllp.com

June 30, 2016

VIA E-MAIL

Laura A. Menninger, Esq.
HADDON, MORGAN AND FOREMAN, P.C.
150 East 10th Avenue
Denver, Colorado 80203
lmenninger@hmflaw.com

Re: *Guiffre v. Maxwell*
Case No. 15-cv-07433-RWS

Dear Laura,

I write pursuant to this Court's June 20, 2016, Order regarding search and production from Defendant's electronic media. Accordingly, please use IMAP Capable software (or a functional equivalent) to capture all of the sent/received emails from Ms. Maxwell's various email accounts, including but not limited to the following: (1) GMax1@ellmax.com (and any other accounts at ellmax.com); (2) gmax1@mindspring.com (and any other accounts at mindspring.com); (3) any of Ms. Maxwell's email account associated with The Terramar Project (including any account ending in @theterramarproject.org); and (4) any other email accounts either used in the past, or currently in use.

Additionally, please use FileSeek software (or a functional equivalent) to retrieve any data, including electronic documents (such as Word documents; PDFs; Excel sheets; etc.), from Ms. Maxwell's devices, including personal computers, work computers, any tablets, and any phones. This includes any cloud storage accounts. Please confirm that you have imaged Ms. Maxwell's hard drives and other devices.

Once you have gathered that data onto a platform (such as Summation or its functional equivalent), please run the below search terms. Since the Court ordered us to negotiate the search terms, please let me know if you think additional terms would be appropriate or whether you object to any terms, and your basis thereof.

When applying the search terms, the search terms need to "hit" on documents even if the terms are embedded within other words. So, for example, the term "acuity" would yield a hit on the document, even if the word in the document is "acuityreputatoin." To return a hit on those

Laura A. Menninger, Esq.
June 30, 2016
Page 2 of 12

embedded terms, I request that you use “wildcards” to ensure that embedded terms are located. (Wildcard characters are used to expand word searches into pattern searches by “replacing” single or multiple characters.) Where there are a specific number of characters needed to be included, a single wildcard will achieve that purpose. For example, in some programs, ! is used for single character wildcards, and * is used for multiple character wildcards. For instance:

- (a) Single character wildcard example: a search for **L!n!** will return “long,” “link,” “lane,” “lone,” etc.
- (b) Multiple character wildcard example: a search for **chil*** will return “children,” “chill,” “chilling,” etc.
- (c) Mixed use of wildcards: a search for **L!n*** will return “lines,” “lining,” “linty,” etc.

Accordingly, the below search terms are submitted with wildcard characters to be applied in the manner of the examples above. Please apply them as such with whatever characters is required by the software/platform that you will be using.

Similarly, regarding how the terms are combined (**AND** or **OR**). **OR** should expand your results while **AND** will restrict result to only those which include all the terms.

Additionally, I want to clarify that I would like all of the metadata to be searched in addition to the text of the documents. For example, if the search term is “acuity,” “hits” should include all the document that include the word “acuity” in their text OR in their metadata (this includes words in items such as email subjects, filenames, as well as any documents which include that word somewhere within their text).

I also wanted to point out another special syntax with regard to proximity searching. This is a search that finds words within a specified distance from one another. On some software, this is represented as w/#, so a search for “**meet w/2 greet**” will return “meet and greet,” “greet and meet” and “meet and nicely greet.” Please apply accordingly.

Additionally, for searches for people’s initials in the search terms, please use “exact matches,” “stand alone,” or “literal” terms (see, e.g., PA, AD, JE, GM).

Finally, the search terms are **not** to be treated as case-sensitive, meaning that the terms should be searched according to their letters, regardless of whether they are represented in the list as containing upper case or lower case letters.


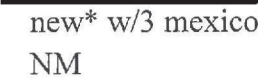
The following are the applicable search terms.

- 1) jef*
- 2) geof*

Laura A. Menninger, Esq.
June 30, 2016
Page 3 of 12

- 3) epst!!n*
- 4) jeevacation*
- 5) j* w/2 *jep*
- 6) j* w/2 *jeep*
- 7) roberts*
- 8) g!!ff!!*
- 9) virginia*
- 10) jenna*
- 11) jena*
- 12) genna*
- 13) andrew*
- 14) prince*
- 15) royal*
- 16) PA
- 17) JE
- 18) GM
- 19) AD
- 20) [REDACTED]
- 21) GX
- 22) massage*
- 23) masseur*
- 24) therapist*
- 25) ellmax*
- 26) mindspring*
- 27) gmax*
- 28) emmy*
- 29) taylor*
- 30) sara*
- 31) kellen*
- 32) kensington*
- 33) vikers*
- 34) dubin*
- 35) eva*
- 36) glen*
- 37) brunel*
- 38) jean*
- 39) luc*
- 40) nadia*

Laura A. Menninger, Esq.
June 30, 2016
Page 4 of 12

- 41) marcinko*
- 42) *copter*
- 43) chopper*
- 44) pilot*
- 45) manifest*
- 46) log*
- 47) flight*
- 48) passport*
- 49) terramar*
- 50) southern* w/3 district*
- 51) palm* w/3 beach*
- 52) state* /3 attorney*
- 53) ross*
- 54) gow*
- 55) acuity*
- 56) victoria* w/3 secret*
- 57) all!n*
- 58) all!n*
- 59) dersh*
- 60) law.harvard.edu*
- 61) alandersh*
- 62) 
- 63) 
- 64) new* w/3 mexico*
- 65) NM
- 66) virgin* w/3 island*
- 67) usvi*
- 68) little* w/3 st*
- 69) little* w/3 saint*
- 70) st* w/3 j*
- 71) saint* w/3 j*
- 72) lsj*
- 73) lagoon*
- 74) clinton*
- 75) BC
- 76) HC
- 77) HRC
- 78) police*

Laura A. Menninger, Esq.
June 30, 2016
Page 5 of 12

- 79) cop*
- 80) fbi*
- 81) federal* w/3 bur*
- 82) bur* w/8 inves! *
- 83) sex*
- 84) abuse*
- 85) toy*
- 86) dildo*
- 87) strap* w/3 on*
- 88) vibr*
- 89) sm* w/3 101*
- 90) slave*
- 91) erotic*
- 92) servitude*
- 93) abernathy*
- 94) brillo*
- 95) high* w/3 school*
- 96) secondary* w/3 school*
- 97) campus*
- 98) duke*
- 99) york*
- 100) licen!e*
- 101) assault*
- 102) juvenile*
- 103) seal*
- 104) joint* w/3 defen*
- 105) jda
- 106) roadhouse*
- 107) grill*
- 108) illegal*
- 109) immune*
- 110) prosecut*
- 111) law* w/3 enforc*
- 112) jane* w/3 *doe*
- 113) hospital*
- 114) hotel*
- 115) suite*
- 116) villa*


Laura A. Menninger, Esq.
June 30, 2016
Page 6 of 12

- 117) model*
- 118) actress*
- 119) france*
- 120) paris*
- 121) zoro*
- 122) ranch*
- 123) vanity* w/ 3 fair*
- 124) alexander*
- 125) kathy*
- 126) miles*
- 127) james*
- 128) austrich*
- 129) phil*
- 130) barden*
- 131) 
- 132) fary*
- 133) boothe*
- 134) laura*
- 135) evelyn*
- 136) boulet*
- 137) boylan*
- 138) bec*
- 139) bunner*
- 140) casey*
- 141) carolyn*
- 142) carolin*
- 143) paul*
- 144) cassell*
- 145) sharon*
- 146) churcher*
- 147) cousteau*
- 148) alexandar*
- 149) devansan*
- 150) 
- 151) 
- 152) edwards*
- 153) amanda*
- 154) ellison*

Laura A. Menninger, Esq.
June 30, 2016
Page 7 of 12

- 155) cimberly*
- 156) espinosa*
- 157) Tatiana*
- 158) farmer*
- 159) maria*
- 160) nn*
- 161) fekkai*
- 162) crystal*
- 163) figueroa*
- 164) anthony*
- 165) tony*
- 166) freeh*
- 167) louis*
- 168) dore*
- 169) gany*
- 170) garvin*
- 171) meg*
- 172) sheridan*
- 173) gibson*
- 174) but!e*
- 175) graff*
- 176) fred*
- 177) phil*
- 178) guderyon*
- 179) 
- 180) 
- 181) harrison*
- 182) shannon*
- 183) victoria*
- 184) hazel*
- 185) brittany*
- 186) henderson*
- 187) jaffe*
- 188) carol*
- 189) kess*
- 190) kutikoff*
- 191) pete*
- 192) listerman*

Laura A. Menninger, Esq.
June 30, 2016
Page 8 of 12

- 193) lyons*
- 194) bob*
- 195) meister*
- 196) jamie*
- 197) melanson*
- 198) lyn! * w/100 miller*
- 199) marvin*
- 200) minsky*
- 201) 
- 202) 
- 203) vanessa*
- 204) mullen*
- 205) pagano*
- 206) mary*
- 207) paluga*
- 208) stan*
- 209) pottinger*
- 210) recarey*
- 211) reiter*
- 212) richards*
- 213) sky*
- 214) rothstein*
- 215) forest*
- 216) sawyer*
- 217) doug*
- 218) schoettle*
- 219) cecelia*
- 220) stein*
- 221) mark*
- 222) tafoya*
- 223) brent*
- 224) tindall*
- 225) kevin*
- 226) kim*
- 227) thompson*
- 228) tuttle*
- 229) vaghan*
- 230) cresenda*

Laura A. Menninger, Esq.
June 30, 2016
Page 9 of 12

- 231) valdes*
- 232) valla*
- 233) martiza*
- 234) vazquez*
- 235) vick*
- 236) ard*
- 237) jarr!d*
- 238) weisfeld*
- 239) courtn!y* w/5 wild*
- 240) alessi*
- 241) rizzo*
- 242) rinaldo*
- 243) biddle*
- 244) sophie*
- 245) sofie*
- 246) degeo*
- 247) anouska*
- ██████████ ██████████
- 249) fontanilla*
- 250) lynn*
- 251) jo* w/3 jo*
- 252) gramza*
- 253) grant*
- 254) waitt*
- 255) ted*
- 256) theod*
- ██████████ ██████████
- ██████████ ██████████
- ██████████ ██████████
- 260) kovylina*
- ██████████ ██████████
- ██████████ ██████████
- 263) lang*
- ██████████ ██████████
- 265) listerman*
- 266) lopez*
- 267) cindy*
- 268) lutz*

Laura A. Menninger, Esq.
June 30, 2016
Page 10 of 12

- 269) mellawa*
- 270) brah*
- 271) jay*
- 272) [REDACTED]
- 273) [REDACTED]
- 274) mitrovich*
- 275) andrea*
- 276) peadon*
- 277) bill*
- 278) francis*
- 279) preece*
- 280) dara*
- 281) louella*
- 282) rabuyo*
- 283) robson*
- 284) haley*
- 285) adriana*
- 286) mucinska*
- 287) spamm*
- 288) visosky*
- 289) doug* OR dan* w/100 wilson*
- 290) igor*
- 291) zinoview*
- 292) allyson*
- 293) alyson*
- 294) alison*
- 295) allison*
- 296) chambers*
- 297) Gwendolyn*
- 298) beck*
- 299) Kelly*
- 300) Kelley*
- 301) Bovino*
- 302) ron*
- 303) burkle*
- 304) max*
- 305) cordero*
- 306) vald*

Laura A. Menninger, Esq.
June 30, 2016
Page 11 of 12

- 307) cotrin*
- 308) chauntae*
- 309) dav*
- 310) teala*
- 311) ry!n*
- 312) dionne*
- 313) anders!n*
- 314) Rosalie*
- 315) fr!!dman*
- 316) tiffany*
- 317) Kathryn*
- 318) eric*
- 319) erik*
- 320) Lesl*
- 321) groff*
- 322) clair*
- ██████████ ██████████
- ██████████ ██████████
- 325) gina*
- 326) ignatieva*
- 327) bret*
- 328) adam*
- 329) perry*
- 330) liffman*
- 331) Michael*
- 332) mike*
- 333) cheri*
- 334) lynch*
- 335) todd*
- 336) ██████████
- 337) ██████████
- 338) Joanna*
- 339) sjoberg*
- 340) leslie*
- 341) wexner*
- 342) underage*
- 343) under!age*
- 344) minor*

Laura A. Menninger, Esq.
June 30, 2016
Page 12 of 12

- 345) daily* w/10 mail*
- 346) daily* w/10 news*
- 347) lie*
- 348) obvious* w/10 lie*
- 349) sex w/3 toy*
- 350) nipple*
- 351) schoolgirl
- 352) school w/3 girl
- 353) us w/3 att*
- 354) United w/3 states w/3 att*
- 355) Guggenheim
- 356) Pedophil*
- 357) Paedophil*
- 358) Gerbil*
- 359) Traffic*
- 360) Bed*
- 361) Bath*
- 362) Masturbate*
- 363) Ejaculate*
- 364) Masseuse*
- 365) Lingerie
- 366) Boies*
- 367) Mccawley*
- 368) Schultz*

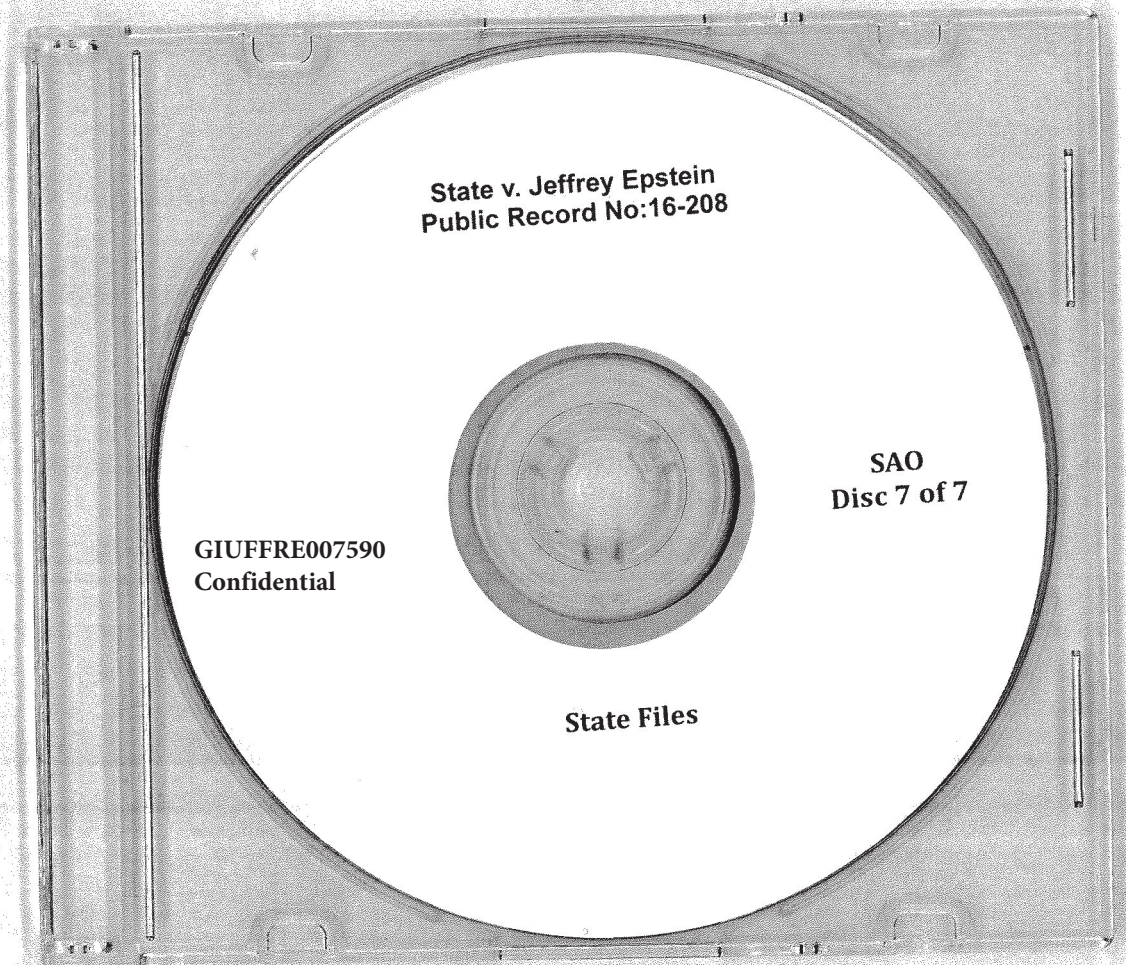
Sincerely,

A handwritten signature in blue ink that reads "Meredith L. Schultz". The signature is written in a cursive, flowing style.

Meredith L. Schultz

MLS:dk

Exhibit 2
(File Under Seal)



State v. Jeffrey Epstein
Public Record No:16-208

SAO
Disc 7 of 7

GIUFFRE007590
Confidential

State Files

VEHICLES


<p>Mercedes Benz 600 2001 Black Licence: EO3PRU → Lic: U90-BQL <i>Gone To NYC 198</i></p>	<p>(561) 309-6415 Rear (561) 379-9390 Front <i>Hakon by Doug</i></p>	<p>Mercedes Benz of Palm Beach 4000 Okeechobee Boulevard West Palm Beach, FL 33409 Att: Shawn Adison Tel: (561) 689-6363</p>
<p>Mercedes Benz 600 1997 Black Licence: G14KCT</p>	<p>(561) 758-1672 Rear (561) 818-8867 Front</p>	
<p>Mercedes Benz 600 Conv 1998 Silver Licence: RAS85L <i>Gone</i></p>	<p>(561) 346-7141</p>	<p><i>Paint work & Body Shop Coach work Contact Dominique</i> [Redacted]</p>
<p>Suburban 2001 Black Licence: WGE53R <i>Gone to Volvo</i></p>	<p>(561) 371-1686</p>	<p>Roger Dean Chevrolet 2235 Okeechobee Boulevard West Palm Beach, FL 33409 Tel: (561) 683-8100</p>
<p>Crysler Mini Van 1996 White Licence: WGE52R <i>Gone</i></p>	<p>(561) 308-5700</p>	<p>Nestor Auto Repairs 2600 Florida Avenue West Palm Beach, FL 33401 Tel: (561) 835-0809</p>
<p>Cobra Grand 1993 Green C97CRJ <i>Kerry's Garage</i></p>		<p>Nestor Auto Repairs 2600 Florida Avenue West Palm Beach, FL 33401 Tel: (561) 835-0809</p>
<p>Volvo 1998 Gold Mrs Epstein</p>	<p>(561) 686-3707</p>	<p>Volvo Palm Beach 5544 Okeechobee Boulevard West Palm Beach, FL 33417 Tel: (561) 471-7600</p>
<p>Oil Well</p>	<p>900 Southern Boulevard West Palm Beach, FL 33405 Tel: (561) 835-9374</p>	<p>Oil change every 3 000 miles</p>

GIUFFRE007590
Confidential

**Registration, insurance and yearly inspection papers to be kept in the glove compartment of each vehicle
Spare keys are kept in the key box in the office**

Muvico Parisian	City Place 545 Hibiscus Street West Palm Beach, FL 33401 Tel: (561) 833-0400	
------------------------	---	--

GROCERY STORES

Bishop Water Co	Tel: (561) 582-1367 <i>Sharon</i>	<i>Sharon</i> bottled water (large and small)
Carmine Giardini's	2401 PGA Boulevard, Suite 172 Palm Beach Gardens, FL 33410 Tel: (561) 775-0105 Fax (561) 775-9233	Fish, meat, gourmet foods 
C'est Si Bon	280 Sunset Avenue Palm Beach, FL 33480 Tel: (561) 659-6503	Gourmet foods
Publix Super Market	265 Sunset Avenue Palm Beach, FL 33480 Tel: (561) 655-4120	General, cleaning, toiletries
Wild Oats	7735 South Dixie Highway West Palm Beach, FL 33405 Tel: (561) 585-8800	Health Foods


HEALTH & BEAUTY

Pharmacy	Greens Pharmacy 151 North County Road Palm Beach, FL 33480 Tel: (561) 832-4443	
	Lewis Pharmacy 235 South County Road Palm Beach, FL 33480 Tel: (561) 655-7867	

GIUFFRÈ007590
Confidential

UTILITIES

<p>Water</p>	<p>City of West Palm Beach 226 Cypress Lane Palm Springs, FL 33461 Tel: (561) 965-5770</p>	<p>Water shut-off for entire property is located next to the mailbox on the sidewalk.</p>
<p>Electricity</p>	<p>Florida Power and Light General Mailing Facility Miami, FL 33188-0001 Tel: (561) 697-8000</p>	
<p>Gas</p>	<p>Florida Gas Company 401 South Dixie Highway West Palm Beach, FL 33401 Tel: (561) 832-0872</p>	
<p>Sewer</p>	<p>City of West Palm Beach 226 Cypress Lane Palm Springs, FL 33461 Tel: (561) 965-5770</p>	
<p>Trash Removal</p>	<p>City of West Palm Beach 226 Cypress Lane Palm Springs, FL 33461 Tel: (561) 965-5770 - <i>Water Dept</i> <i>(561) 965 4022 Trash Removal</i></p>	<p>Daily (Monday -Friday) <i>Recyclables (Thurs before Noon)</i></p>
<p>Telephone</p>	<p>ETC 2921 N Australian Avenue West Palm Beach, FL 33407 Tel: (561) 881-8118</p>	<p><i>5-11-14</i> <i>1-11-14</i></p>
	<p>Bell South Tel: (561) 780-2611</p>	


Plumber <i>General PLUMBING</i> <i>561-585-2591</i>	Foster Plumbing 2800 Westgate Avenue West Palm Beach, FL 33409 Tel: (561) 686-1721	General plumbing repairs
	Roto Rooter 6600 NW 12th Avenue, Suite 213 Fort Lauderdale, FL 33309 Tel: (561) 832-1495	Blocked drains
Pool	Hackl Pools 1331 Central Terrace Lake Worth, FL 33460 Tel: (561) 588-7493 <i>Valerie</i>	Monday and Thursday at 10:30am Clean pool, filter, add salt (Michello) 
Tree Trimming	County Wide Tree Service Tel: (561) 371-5786	First Monday in May and November

STORAGE

Storage USA	5580 Okeechobee Boulevard West Palm Beach, FL 33417 Tel: (561) 683-9955	10 ft x 20 ft unit available
--------------------	---	------------------------------

VEHICLES

Car Detailing	 Palm Beach Wash & Auto Detail 1229 N. Dixie Highway (at Amoco Gas) Tel: (561) 835-8748 <i>James?</i>	
----------------------	--	--

George
Clean Car Services

7246 W 1st Ave
Boynton Beach FL
33426

G.G.
724 SW 1st Ave.
Boynton Beach, FL
3

MAIL & DELIVERY SERVICES


FedEx	1-800-463-3339	Account No: [REDACTED] Drop-off box is next to Palm Beach National Bank on Worth Avenue
Post Office	401 South County Road West Palm Beach, FL Tel: (561) 832-0697	

MAINTENANCE

Air Conditioning	Cassidy Air Conditioning 501 Fern Street West Palm Beach, FL 33401 Tel: (561) 833-6331 <i>- Kathy</i> <i>- Kerry</i>	Monthly service contract First Monday of every month <i>- Job (Technician)</i> <i>* Bob (Filter Service)</i> <i>s/c Payment</i>
Awnings	American Awning Company 537 Pine Terrace West Palm Beach, FL 33405 Tel: (561) 832-7123	<i>Call</i>
Cable Service	Adelphia Cable 1401 North Point Parkway West Palm Beach, FL 33407 Tel: (561) 478-8300	<i>Call</i>
Carpenter	Tel: (561) 994-8906 [REDACTED]	Erwin <i>Ray</i> <i>Call</i>
Carpet Cleaners <i>Mary Sue</i>	Stanley Steamers Tel: (561) 586-5700	Wall to wall <i>2 - Call</i>
	Merry Rugs Tel: (561) 588-8588	Loose rugs
Computers	Bloomberg 499 Park Avenue New York, NY 10022 Tel: (212) 318-2100	Palm Beach consultants: Chad Bonta Peter Kapopoulos <i>Changed</i> Tel: [REDACTED]

GIUFFRE007590
Confidential

TRAVEL

Pilots	Larry Visoski ✓	
	Dave Rodgers	
	Larry Morrison	
Mr Epstein's planes	Jet Aviation	<p>(561) 233-7241</p> <p>Procedure for leaving cars at the airport: Leave car at Jet Aviation landing strip Leave the keys in the car Advise Jet Aviation Tail #909JE or Tail #908JE They will tag and pull car to plane upon arrival</p>
Ms Maxwell's plane	Raytheon <i>Changed to:</i> <i>Fly Options</i>	<p>1-888-835-9782</p> <p>Contract No: Air 4 Tail # ...TA <i>970 @ J</i> Always a Beech Jet or Hawker</p>
Commercial Airlines	Air France	1-800-237-2747
	American	1-800-433-7300
	British Airways	1-800-247-9297
	Continental	1-800-525-0280
	Delta	1-800-221-1212
	South African Airways	1-800-722-9675
	United	1-800-241-6522
	US Air	1-800-428-4322

- Carlos Arltz Handy men (561)

→ Colonial Bank /worth Ave.
 - Ben Leon
 - Leonor

BANKING

Household Banking Account	Palm Beach National Bank 125 Worth Avenue Palm Beach, FL 33480 Tel: (561) 653-5594	Account No: [REDACTED] Send to Eric Gany for reconciliation \$1,000 Petty Cash Float
----------------------------------	---	--

BICYCLES

Bicycles	Palm Beach Bicycle Trail Shop 223 Sunrise Avenue Palm Beach, FL 33480 Tel: (561) 659-4583	Mongoose Crossway 450 Raleigh Aluminium 300 Mercedes Benz Signal Sports Bike Schwinn World Huffy Santa Fe Raleigh Sport Scott Boston
-----------------	--	---

BOOKSTORES

Newspapers	Publix Super Market 265 Sunset Avenue Palm Beach, FL 33480 Tel: (561) 655-4120	
Magazines	Main Street News 255 Royal Poinciana Way Palm Beach, FL 33480 Tel: (561) 833-4027	

CLEANING SERVICE

Francis Peadon House Cleaning Services	[REDACTED]	Every Tuesday and Wednesday 8:00am - 4:00pm (Francis and Pastora Peadon)
---	------------	--

NT

The Breakers	One South County Road Palm Beach, FL 33480 Tel: (561) 655-6611	Renew car park stickers every September
Comedy Corner	2000 South Dixie Highway West Palm Beach, FL 33401 Tel: (561) 833-1812	
The Mar-a-Lago Club	1100 South Ocean Boulevard Palm Beach, FL 33480 Tel: (561) 832-2600	

GIUFFRE007590
 Confidential

Sam Co. System (561) 715-4832 Sam

<p>Electrician</p>	<p>Energy Efficient Electric Tel: (561) 655-7211</p>	<p><i>changed.</i></p>
<p>Exterminator</p>	<p>Palm Beach Exterminating Tel: (561) 689-0808</p>	<p>Contact is Ken First Monday of every month at 10:30am Also use for termite tent</p>
<p>Garden Service</p>	<p>Alan Stopek Efflorescence [Redacted] Wellington, FL 33414 [Redacted]</p>	
	<p>Jerome Pierre [Redacted]</p>	<p>Part-time help. Billed through Alan Stopek. In residence: Daily from 6.30am Not in residence: Mon - Fri from 2pm - 5pm Also maintains Mrs Epstein's property on Saturday mornings.</p>
<p>Garage Doors</p>	<p>The Doorsmith 4160 NW First Avenue Boca Raton, FL 33431 Tel: (561) 391-7768</p>	
<p>Gates</p>	<p>Reich Metal Fabricators Tel: (561) 585-3173</p> <p><i>Tom</i> <i>John</i></p>	<p>Back door gate switch - above garage door controls. When open, round red light is on. Front door gate switch - in telephone outlet above the kitchen telephone</p>
<p>Irrigation</p>	<p>Dolphin Sprinkler Inc Tel: (561) 844-8082</p> <p><i>Janet</i></p>	<p><i>Alan Bantz</i></p>
<p>Landscape Spraying</p>	<p>Academy Services Tel: (561) 478-4629</p>	<p>Arrange through Alan Stopek</p>
<p>Locksmith</p>	<p>Wilson Rowan Locksmiths 625 South Dixie Highway West Palm Beach, FL 33401 Tel: (561) 655-3637</p>	
<p>Painter</p>	<p>[Redacted]</p>	<p>Bill <i>changed</i></p>

GIUFFRE007590
Confidential

Suburb of Sunrock

Sarah

* Adriana

Ashley
* Stopok

- Boltz

- Benjamin
State Dept

* - Bruno

- Dave (Pilot)

- David (Cook)

- E. Mallico

* - George Meertens A

- Christine

- Nediz

- Helen

- Omar

- Tom Lee (Koron Models)

* - Jorge Meertens

P.B. Skell

- Larry (Pilot)

P.B. Harris

- Lenny (Electric)

P.B. Fay

- Miguel

P.B.

- Mike Pecore

Mom's

1.

2.

3.

Sarah

Address / Telephone Sheet

Sarah's E Mail!



358 El Brillo Way, Palm Beach Fl, 33480

Name Address Telephone/Fax

Mr. Jeffrey Epstein (NYSG LLC) Office
457, Madison Avenue 4th Floor
New York, NY 10021.



Leslie
Jenn (Scty)
Helen Fox

Ms. Ghislaine Maxwell

Accountants

Eric Gany
• EMAD HANNA (St. Rep)
Bella Klein-Accountants
• (Pcty Cash Rep.)
Assistants



Deutsche Bank!!!

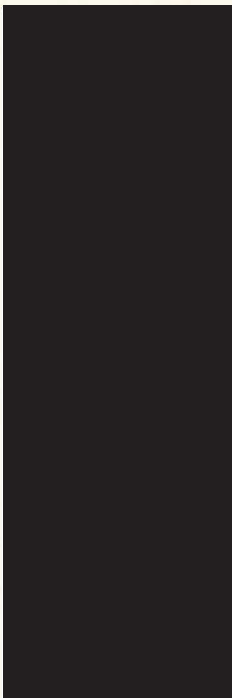
Leslie Groff (JE Sec)
Cecelia
Helan Kim
~~Michelle Compe~~
Jenn Doyle
Property

Keith Blumberg

Engineer

Richard Barnett
DOUG Architekt (212) 249-1113 O.
SCHOETTLE (212) 717-4672 F.
Computers
Mark Lumberg

E 71st
N.Y.
00



→ Not in Service?

Residences of Mr. Jeffrey Epstein

9 East 71st Street,
New York NY 10021

Mr. Jeffrey Epstein

Ms. Ghislaine Maxwell

Staff

House Manager Jojo
House Manger Lynn

Staff Phone

Chef Brent Tindall

GIUFFRE007590
Confidential

Home Depot
478.0783 *Mon*

Palm Beach Contractors

General Plumbing

Customer Service representative Amy 561 585 2591

Electrical

Reel Power Inc Lenny (electrician) 561 706 0827

Gates

Samco Systems Sam (owner) 561 719 4832
 Service gate switch: above garage door controls, when round light is on
 Front gate switch: just above the telephone outlet kitchen area

Garage doors

The Door Smith Inc Keith Kelly



Telephones

Southern Bell (repairs) 561 780 2355

Internal Phone system (NEC)

Repair and Programming 561 881 8118

Alarm System

Benham Industries Inc Keith 854 491 4112

Locksmith

Wilson & Rowan 561 655 3637

A/C Maintenance

John C Cassidy 24 hr service



Handyman

Carlos (carpenter) *4v.49*
Pa. 42



Landscape

Alan Stopeck

Pest Control



Palm Beach Exterminator Kim 561 844 8082

Irrigation

Dolphin Sprinkle 561 478 4696

Pool Heating

National Pool Service When needed 561 585 8866

Pool Maintenance

Hack Pool Service Monday/ Thursday 561 588 7493

Tree Trimming

Country Wide Trees Twice, summer/winter 561 371 5786

Carpet Cleaners

Stanley Steamers wall to wall 561 586 5700
 Merry Rug area rug 561 588 8588

Alarm - 954.

GIUFFRE007590
 Confidential

POST OFFICE

- 1-800-275-8777
561-659-0261

red 1
8-12

Cable

Adelphia cable Cable TV 561 468 8300

697.8473
1-888-683-1000

Bottled Water.

Bishop water company Avion water 561582 1367

Upholsterer

Frank Jennes [REDACTED]

Gas

Gas Energy Inc (Joe Di Giovanni) all gas repairs) 561 963 0505

Laundry equipment

May Tag 1800 622 4729

Painter

Sam Contact Lenny [REDACTED]

Storage

Storage USA 561 683 5835

5580, Okeechobee Blvd

Unit 6218

Grocery & General Household items

General Grocery

Publix 561 655 4120
265, Sunset Ave

Gourmet food

C' est si bon 561 659 6503
289, Sunset Blvd

Carmines

2401 PGA Blvd Take 95 North to PGA Blvd 561 775 9233
Too Jays Gravelox/ Nova sliced salmon 561 655 6545

Green Pharmacy

151., N County Road 561 832 4443

Flowers

Extra touch Flowers 561 835 8000

Hardware

Home Depot 561 832 0783
Sewell Hardware 561 832 7171
528, Clematis Street

Newspapers

Main Street News 561 833 4027
255, Royal Poinciana Way

Post Office

401, South County Road, 561 832 0697

Car Detailing

George [REDACTED]

Taxi Service/Limo

Dan Tischen [REDACTED]

FedEx

114420816 (Monday & Thursday) 1800 463 3339

Recycling

Every Thursday 6AM to 5PM

Trash collection

M-F once a day Early Morning

Cars

Mercedes of Palm Beach 561 689 6393

Chevrolet 561 683 8100

Auto Repairs Gray Sunoco 340 South County 561 655 6645

Nestor Auto 2600, Florida Avenue 561 835 0809

Gasoline Gray Sunoco

ALL AMERICAN SHOOTERS

561-712-9882

GIUFFRE007590
Confidential

Malina



* INTEL *

*

From Sgt Dan Szczerewski



w/F >



Per Curtis



could talk w/ EPSTEIN KNOWS
him WELL. INFO passed on to Capt.

~~XXXXXXXXXXXXXXXXXXXX~~

- [REDACTED]
- 12:50pm [REDACTED]
ABIGAIL Wexner -wants to talk to you @ something private
- [REDACTED] Friday
- 6/19 7:15pm Adriana
- 6/17 5:55pm Glen [REDACTED]
- 12:30 [REDACTED] has a @ For you- can you please call her
[REDACTED]
- 6/19 1020pm Jean Luc
- signed Neiman Marcus 6/9/05 \$ 33.02 Amex [REDACTED]
- [REDACTED] will be here @ 6:30am 01/06
- 6/19/05 1:00pm Jean Luc
- Four season 582-2800 Waitt
- 6/18/05 6:40 Nathalie
- [REDACTED]
- 6/19/05 Stephanie Burns [REDACTED]
- TONYAWORLD.COM
Janina [REDACTED]
[REDACTED]
Valerie [REDACTED]
Ostrousley Anna
[REDACTED]

GIUFFRE007590
Confidential

EXHIBIT 8

United States District Court
Southern District Of New York

-----X

<p>Virginia L. Giuffre, Plaintiff,</p> <p>v.</p> <p>Ghislaine Maxwell, Defendant.</p>	<p>15-cv-07433-RWS</p>
--	-------	-------------------------------

-----X

**DEFENDANT GHISLAINE MAXWELL'S
INITIAL F.R.C.P. 26(a)(1)(A) DISCLOSURES**

Pursuant to F.R.C.P. 26(a)(1)(A), Defendant Ghislaine Maxwell makes the following disclosures:

I. IDENTITIES OF INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION RELEVANT TO DISPUTED FACTS ALLEGED WITH PARTICULARITY IN THE PLEADINGS

1. Ghislaine Maxwell
c/o Laura A. Menninger, Esq.
Haddon, Morgan & Foreman, P.C.
150 E. 10th Ave.
Denver, CO 80203
303-831-7364
LMenninger@HMFLaw.com

Ms. Maxwell is the Defendant and may have knowledge concerning matters at issue, including the events of 1999-2002 and the publication of statements in the press in 2011-2015.

2. Virginia Lee Roberts Giuffre
c/o Sigrid S. McCawley, Esq.
Boies, Schiller & Flexner LLP
401 East Las Olas Boulevard, Suite 1200

Mr. Edwards has knowledge concerning Plaintiff's false statements to the press, in court pleadings, and in sworn testimony at issue in this matter. Mr. Edwards also has knowledge concerning "Victim's Refuse Silence, Inc."

7. Jeffrey Epstein
c/o Tonja Haddad Coleman, Esq.
315 SE 7th Street, Suite 301
Fort Lauderdale, FL 33301
(954) 467-1223

Mr. Epstein has knowledge concerning Plaintiff's false statements to the press and in court pleadings, as well as the events of 1999-2002 concerning Plaintiff and Defendant.

8. Anthony Figueroa
Address unknown at this time
Telephone number unknown at this time

Mr. Figueroa may have knowledge concerning matters at issue, including Plaintiff's activities during 1996 – 2002.

9. Louis Freeh
Address unknown at this time



Mr. Freeh may have knowledge concerning travel of Bill Clinton.

10. Robert Giuffre
Address unknown at this time
Telephone number unknown at this time

Mr. Giuffre is may have knowledge concerning matters at issue, including Plaintiff's activities during 2002-2016 and her damages allegations.

11. Ross Gow
Acuity Representation
23 Berkeley Square
London W1J 6HE



Mr. Gow may have knowledge concerning matters at issue, including the publication of statements in the press in 2011-2015 concerning Plaintiff and Defendant.

Dated: February 24, 2016.

Respectfully submitted,

s/ Laura A. Menninger

Laura A. Menninger (LM-1374)
HADDON, MORGAN AND FOREMAN, P.C.
150 East 10th Avenue
Denver, CO 80203
Phone: 303.831.7364
Fax: 303.832.2628
lmenninger@hmflaw.com

Attorney for Ghislaine Maxwell

CERTIFICATE OF SERVICE

I certify that on February 24, 2016, I electronically served this *DEFENDANT GHISLAINE MAXWELL'S INITIAL F.R.C.P. 26(A)(1) DISCLOSURES* via e-mail on the following:

Sigrid S. McCawley
BOIES, SCHILLER & FLEXNER, LLP
401 East Las Olas Boulevard, Ste. 1200
Ft. Lauderdale, FL 33301
smccawley@bsflp.com

s/ Laura A. Menninger

Laura A. Menninger

**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 MOTION TO ENFORCE THE COURT'S ORDER AND DIRECT
DEFENDANT TO ANSWER DEPOSITION QUESTIONS FILED UNDER SEAL**¹

Plaintiff Virginia Giuffre, by and through her undersigned counsel, hereby files this Motion to Compel Defendant to Answer Deposition Questions. On June 20, 2016, this Court Ordered Defendant to sit for a second deposition because her refusal to answer questions posed in her first Deposition (June 20, 2016 Sealed Order, filed in redacted version at D.E. 264-1). Yet, during her second deposition, Defendant again refused to answer numerous questions regarding sexual activity related to Jeffrey Epstein in contravention of this Court's Order. Accordingly, the Court should direct her to fully answer the relevant questions.

FACTUAL BACKGROUND

As the Court is aware, this defamation case involves Ms. Giuffre's assertions that she and other females were recruited by Defendant to be sexually abused by Jeffrey Epstein under the guise of being "massage therapists." See Complaint, DE1, at ¶ 27 (Giuffre "described Maxwell's role as one of the main women who Epstein used to procure under-aged girls for sexual activities

¹ Defendant has labelled her entire deposition transcript as Confidential at this time.

and a primary co-conspirator and participant in his sexual abuse and sex trafficking scheme”).

Numerous other witnesses, with knowledge of Defendant’s activities, have testified to the same:

- *See* Schultz Declaration (“Schultz Decl.”) at Composite Exhibit 1, Excerpts from May 18, 2016, Deposition of Johanna Sjoberg at p. 34:20-35:1. “Q. And did you -- what did you understand her to mean? A. [Maxwell] was implying that I did not get Jeffrey off, and so she had to do it. Q. And when you say "get Jeffrey off," do you mean bring him to orgasm? A. Yes.” . . . “How long did you work for Jeffrey and Ghislaine? A: I believe it was five years, 2001 to 2006. Q. And how many massages did Epstein receive per day on average? THE WITNESS: Three.” *Id.* at pg. 30:15-25. . . “Q. Did Jeffrey ever tell you why he received so many massages from so many different girls? A. He explained to me that, in his opinion, he needed to have three orgasms a day. It was biological, like eating.” *Id.* at p.32: 9-16.
- *See* Schultz Decl. at Composite Exhibit 2, Excerpts from June 24, 2016, Deposition of Tony Figueroa at pg. 200:5-18; 96:8-15. “Q. . . .when Ghislaine Maxwell would call you during the time you were living with Virginia, she would ask you what specifically? A. Just if I had found any other girls just to bring to Jeffrey. Q. Okay. A. Pretty much every time there was a conversation with any of them it was either asking Virginia where she was at, or asking me to get girls.” “Q What has -- what is that? A. That her [Virginia] and Maxwell and Jeffrey would obviously be doing stuff, all three of them together. Like I said that they would all go out to clubs to pick up girls and try to find them to bring back for Jeffrey. And then she told me about how, like I said, her and Ms. Maxwell and Jeffrey were all intimate together on multiple occasions.”
- *See* Schultz Decl. at Composite Exhibit 3, Excerpts of June 21, 2016, Deposition of Detective Recarey at pg. 29:11-20. “Q. “Okay. During your investigation, what did you learn in terms of Ghislaine Maxwell's involvement, if any? THE WITNESS: Ms. Maxwell, during her research, was found to be Epstein's long-time friend. During the interviews, Ms. Maxwell was involved in seeking girls to perform massages and work at Epstein's home.”
- *See* Schultz Decl. at Composite Exhibit 4, Excerpts from June 10, 2016, Deposition of Rinaldo Rizzo at pg. 52:8. “A. What happens next when Ghislaine Maxwell and Jeffrey Epstein and a 15-year-old girl walk into Eva Anderson's home? . . . “A. She proceeds to tell my wife and I that, and this is not -- this is blurting out, not a conversation like I'm having a casual conversation. That quickly, I was on an island, I was on the island and there was Ghislaine, there was Sarah, she said they asked me for sex, I said no. And she is just rambling, and I'm like what, and she said -- I asked her, I said what? And she says yes, I was on the island, I don't know how I got from the island to here. Last afternoon or in the afternoon I was on the island and now I'm here. And I said do you have a -- this is not making any sense to me, and I said this is nuts, do you have a passport, do you have a phone? And she says no, and she says Ghislaine took my passport. And I said what, and she says Sarah took her passport and her phone and gave it to Ghislaine Maxwell, and at that point she said that she was threatened.” *Id.* at pg. 56:2-24

- See Schultz Decl. at Composite Exhibit 5, Excerpts from June 1, 2016, Deposition of John Alessi at pg. 28:6-15. “Q. And over the course of that 10-year period of time while Ms. Maxwell was at the house, do you have an approximation as to the number of different females -- females that you were told were massage therapists that came to the house? THE WITNESS: I cannot give you a number, but I would say probably over 100 in my stay there.” *Id.* at pg. 30:15-25 “Q: Did you go out looking for the girls -- A. No. Q. -- to bring -- A. Never. Q. -- as the massage therapists? A. Never. Q. Who did? A. Ms. Maxwell, Mr. Epstein and their friends, because their friends relayed to other friends they knew a massage therapist and they would send to the house. So it was referrals.”

In response to Ms. Giuffre’s assertions about Defendant recruiting of females for sexual purposes, Defendant has made the sweeping claim that Ms. Giuffre’s assertions are “entirely false” and “entirely untrue.” Complaint, DE 1, at ¶ 31. Accordingly, this Court directed as follows:

Defendant is ordered to answer questions relating to ***Defendant’s own sexual activity*** (a) with or involving Jeffrey Epstein (“Epstein”), (b) with or involving Plaintiff, (c) with or involving underage females known to Epstein or who Defendant believed or intended might become known to Epstein, or (d) involving or including massage with individuals Defendant knew to be, or believed might become, known to Epstein. Defendant is also directed to answer questions relating to ***her knowledge of sexual activities of others*** (a) with or involving Epstein, (b) with or involving Plaintiff, (c) with or involving underage females known to Epstein or who Defendant believed were known or might become known to Epstein, or (d) involving or including massage with individuals Defendant knew to be or believed might become known to Epstein. (FN. Each of the aforementioned lists are disjunctive.) The scope of Defendant’s answers are not bound by time period, though Defendant need not answer questions that relate to none of these subjects or that is clearly not relevant, such as sexual activity of third-parties who bear no knowledge or relation to the key events, individuals, or locations of this case.

See Schultz Decl. at Exhibit 6, Sealed June 20, 2016, Order at p. 10 (Emphasis added).

Despite this instruction from the Court, during her deposition, Defendant refused to answer many questions related to “sexual activity with or involving Jeffrey Epstein, with or involving Plaintiff . . . or involving or including massage with individuals Defendant knew to be or believed were known to might become known to Epstein.” The result was that at a number of

points throughout her deposition, Defendant refused to answer questions about subjects integral to this lawsuit, including questions about a student, Joanna Sjoberg, who Defendant recruited from her school to give massages to, and have sex with, Jeffrey Epstein under the guise of hiring her to answer phones.

For example, Defendant refused to answer questions about recruiting Ms. Sjoberg for sex with Epstein:

Q. So is it fair to say that Johanna was initially hired to answer telephones, according to your testimony?

MR. PAGLIUCA: This has already been testified to Mr. Boies. We are repeating testimony now.

MR. BOIES: I think in the context of the witness' answers, these are fair questions. Now, I've asked you before, if you want to instruct her not to answer, if you want to go to the judge, we are happy to do that, but I would suggest in the interest of moving it along, that you stop these speeches.

MR. PAGLIUCA: You are not moving it along is the problem, so maybe we should call the court and get some direction here, because I am not going to sit here and rehash the testimony we already gave.

MR. BOIES: That's fin[e]. [At this point a telephone call was placed to Judge Sweet's chambers].

See Schultz Decl. at Composite Exhibit 7, Excerpts from July 22, 2016, Deposition of Ghislaine Maxwell at pg.78:17-79:14.

MR. BOIES: So how did it happen, Ms. Maxwell, that Joanna, who had been hired to answer the phones, ended up giving massages to you and Mr. Epstein.

MR. PAGLIUCA: I'm going to instruct you not to answer the question. This has been previously, the subject of your former deposition, it doesn't fall into any of the categories ordered by the court, and so you don't need to answer that.

Id. at pg.81:15-25.

Defendant's counsel's instruction not to answer was improper. This Court's Order stated: "Defendant is also directed to answer questions relating to her knowledge of sexual activities of others . . . involving or including massage with individuals Defendant knew to be or believed

might become known to Epstein.” Ms. Sjoberg is an important witness in this case – one of the witnesses Ms. Giuffre has deposed. She is an individual Defendant knew to be known to Epstein, who knew and interacted with Ms. Giuffre when Ms. Giuffre was underage, and who participated in massage and sexual activities with Epstein. Defendant knew that Ms. Sjoberg was known to Epstein as Defendant recruited her to massage Epstein and participate in sexual activities during those massages. And Ms. Sjoberg testified directly about Defendant’s involvement, including Defendant’s offer of an expensive camera in exchange for sex:

Q. Was there anything you were supposed to do in order to get the camera?

A: I did not know that there were expectations of me to get the camera until after. She [Maxwell] had purchased the camera for me, and I was over there giving Jeffrey a massage. I did not know that she was in possession of the camera until later. She told me -- called me after I had left and said, I have the camera for you, but you cannot receive it yet because you came here and didn't finish your job and I had to finish it for you.

Q. And did you -- what did you understand her to mean?

A. She was implying that I did not get Jeffrey off, and so she had to do it.

Q. And when you say "get Jeffrey off," do you mean bring him to orgasm?

A. Yes.

See Schultz Declaration at Composite Exhibit 1, Excerpts from May 18, 2016 Deposition of Johanna Sjoberg at p. (P. 34:5-35:1).

Q: What did you understand Maxwell to mean when she said you hadn't finished the job, with respect to the camera?

A: She implied that I had not brought him to orgasm.

Q. So is it fair to say that Maxwell expected you to perform sexual acts when you were massaging Jeffrey?

A: Yes, I took that conversation to mean that is what was expected of me.”

Id. at p. 142:25-143:14 (Emphasis added).

In the wake of this specific deposition testimony from Ms. Sjoberg, during her own recent deposition, Defendant continued to refuse to testify about Ms. Sjoberg's massages and sexual activity with Epstein:

Q. Did Mr. Epstein pay Johanna for the massages that she gave Mr. Epstein?

Mr. Pagliuca: You just asked this question, and I told her not to answer. I will tell her not to answer again for the same reasons.

Q. Do you know how much Mr. Epstein paid Johanna to give massages?

Mr. Pagliuca: Same instruction to the witness. Why do you believe this is within the scope of the court's order?

Mr. Boies: Because of the court's reference to massages, and because I think how much a girl who was hired to answer the phone was paid to give a "massage" goes to whether there actually was or was not sexual activity involved.

Mr. Pagliuca: The witness has testified there wasn't.

Mr. Boies: Perhaps it will surprise you, I think it should not, that I do not believe in my deposition I need to simply accept her characterization without cross-examination. Now that's something the judge can decide, but a question as to how much this young girl was being paid for a "massage," I think goes directly to the issue of sexual activity.

See Schultz Decl. at Composite Exhibit 7, Excerpts from July 22, 2016 Deposition of Ghislaine Maxwell at pg. 82:25-84:6.

Additionally, Defendant refused to answer questions concerning the sexual abuse involving herself, Mr. Epstein, and Annie and Maria Farmer, described in a Vanity Fair article:

"What do you have on the girls?" [Epstein] would ask the question over and over again. What I had "on the girls" were some remarkably brave first-person accounts. Three on-the-record stories from a family: a mother and her daughters [Maria Farmer, Annie Farmer, and their mother] who came from Phoenix. The oldest daughter, an artist whose character was vouchsafed to me by several sources, including the artist Eric Fischl, had told me, weeping as she sat in my living room, of how Epstein had attempted to seduce both her and, separately, her younger sister, then only 16. He'd gotten to them because of his money. He promised the older sister patronage of her art work; he'd promised the younger funding for a trip abroad that would give her the work experience she needed on her resume for a place at an Ivy League university, which she desperately wanted - and would win. The girls' mother told me by phone that she had thought her daughters would

be safe under Epstein's roof, not least because he phoned her to reassure her, *and she also knew he had Ghislaine Maxwell with him at all times*. When the girls' mother learned that *Epstein had, regardless, allegedly molested her 16-year-old daughter*, she'd wanted to fight back.

"I Tried to Warn You about Sleazy Billionaire Jeffrey Epstein in 2003," Vicky Ward, January 6, 2015, *Daily Beast* Article (Emphasis added). Defendant would not answer many questions concerning her role with in the molestation of these girls while she was sharing a house with Maria Farmer and Jeffrey Epstein:

Q. Do you know whether or not Maria Farmer was ever at Mr. Wexner's property in Ohio?

Mr. PAGLIUCA: Can you tell me how that relates to this order, counselor?

MR. BOIES: Yes, I think it goes directly to the sexual activity related to Maria Farmer and what Mr. Epstein was doing with Maria Farmer. Again, you can instruct not to answer.

MR. PAGLIUCA: I'm trying to understand why you are asking these questions before I -

MR. BOIES: I'm asking these questions because these are people who not only have been publicly written about in terms of the sexual activity that they were put into in connection with Mr. Epstein, but the person who wrote about them is someone who talked to the witness about it, and I think that this is more than easily understood cross-examination.

MR. PAGLIUCA: Your question was, do you know whether or not Maria Farmer was ever at Mr. Wexner's property in Ohio.

MR. BOIES: Yes. And if you let her answer, you will see where it leads. If you won't let her answer, the judge is going to determine it. And I just suggest to you that you stop these speeches and stop debating, because you are not going to convince me not to follow-up on these questions. If you can convince the court to truncate the deposition, that's your right, but all you're doing is dragging this deposition out.

MR. PAGLIUCA: You have the opportunity to give me a good faith basis why you are asking these questions.

MR. BOIES: I have given you a good faith basis.

MR. PAGLIUCA: You haven't.

MR. BOIES: Then instruct not to answer.

MR. PAGLIUCA: I am giving you the opportunity to say why you are asking the questions, and why I'm telling her not to answer and I am entitled to know that.

MR. BOIES: You are not entitled to know why I'm asking the question. You are only entitled to know that it relates to the subject matter that I am entitled to inquire about, and I don't think the judge is going to think that, you know, where Mr. Epstein shipped Maria Farmer off to is outside the scope of what I'm entitled to inquire about.

See Schultz Decl. at Composite Exhibit 7, Excerpts from July 22, 2016 Deposition of Ghislaine Maxwell at pg. 99:6-101:20.

Defendant's counsel also stopped a line of questioning in which Defendant was asked if she recalled several girls Tony Figueroa brought over to give a "massage" to Epstein. The Court will recall that Mr. Figueroa previously testified in this case that he brought underage girls to Epstein at Defendant's behest, and that Defendant called him, asking him to bring the girls.² Accordingly, at Defendant's recent deposition, Ms. Giuffre's counsel attempted to follow up on this subject:

Q. Have you ever heard the name of Carolyn Andriamo, A-N-D-R-I-A-M-O?

A. I don't recollect that name at all.

² Tony Figueroa testified that Defendant called him and asked him to bring girls over, and that there were no "legitimate" massages: "Q. Any of the girls that you are aware of having gone to the house - either because you brought them or Virginia - as you sit here today, do you believe any of them were brought over to be legitimate masseuse? A. Nope." See Schultz Decl. at Composite Exhibit 2, Excerpts from June 24, 2016, Deposition of Tony Figueroa at pg. 245:1-8. "Q. And how long would you and one of these girls sit there and have this small talk with Ms. Maxwell? A. No more than 10 or 15 minutes. Q. All right and what were you waiting for? A. Pretty much her to take them upstairs. And then I would leave. Like I would have to wait for them to be like, 'All right. Well we're ready.' And I would be like 'All right. See you later.' And then I'd leave. And they would go do whatever." *Id.* at pg. 193:14-25. "Q. During this 2001 period, if you were driving Virginia and other girl to the house, what type of girls would you be driving? A. Pretty much like young looking teenagers 16, 17. Really pretty. You know." *Id.* at pg. 182:4-10.

MR. PAGLIUCA: Mr. Boies, those names are on Exhibit 26, which we have already gone over and she said she didn't recognize those people, so now we are just repeating things that we went over.

MR. BOIES: I am in the context of seeing if I can refresh her recollection, because these are women that [REDACTED] who she also does not recall, brought over to Mr. Epstein's residences, and I also want to make a very clear record of what her testimony is and is not right now.

Again, you can instruct her not to answer if you wish.

MR. PAGLIUCA: I'm trying to get to nonrepetitive questions here. You basically asked the same question three times. Then we get a pile of notes that get pushed up to you, you read those. Then you ask those three times, and then we go to another question. So it's taking an inordinately long amount of time and it shouldn't.

MR. BOIES: I think that is a demonstrably inaccurate statement of what has been going on, and I attribute -- maybe I shouldn't attribute it at all. But if you want to instruct not to answer, instruct not to answer. If you don't, again, all I will do is request that you cease your comments. I can't do that. All I can do is seek sanctions afterwards.

See Schultz Decl. at Composite Exhibit 7, Excerpts from July 22, 2016, Deposition of Ghislaine Maxwell at pg. 154:20-156:10.

Based on Defendant's refusal to answer questions related to specific girls, Mr. Boies was forced to discontinue asking questions about these victims.

Defendant also refused to answer questions concerning the "sexual activities of others . . . involving or including massage with individuals Defendant knew to be or believed might become known to Epstein," when she refused to answer a question about the records she kept of the young girls who would perform massage and sexual activities with Epstein:

Q. Was there a list that was kept of women or girls who provided massages?

MR. PAGLIUCA: This has been previously deposed on. This is not part of the court's order, I will tell her not to answer.

MR. BOIES: You are going to tell her not to answer a question that says was there a list of women or girls who provided massages?

MR. PAGLIUCA: She has been previously deposed on this subject.

MR. BOIES: I think this is squarely in the court's order, but if you instruct her not to answer, you instruct her not to answer.

MR. PAGLIUCA: We'll find out.

Id. at pg. 184:14-185:6.

Q. "In 2005, were you aware of any effort to destroy records of messages you had taken of women who had called Mr. Epstein in the prior period?"

MR. PAGLIUCA: Don't answer that question. It's outside the court's order.

Id. at pg. 177:5-11.

Ample evidence in this case establishes that not only did Defendant recruit underage girls for massage and sexual activities with Epstein, but that she participated in calling the girls; getting other people to bring girls; talking to the girls; taking massages from and leaving messages about the girls; and scheduling the girls to come over. Accordingly, questions concerning written records documenting Defendant's involvement in, and knowledge of, the girls who "massaged" Epstein is clearly within the ambit of this Court's Order. For example, a message from July of 2004 records Defendant, "Ms. Maxwell," giving a message to Mr. Epstein as message from [REDACTED] (an underage girl who was *14 years old* on the date of the message) that "[REDACTED] is available on Tuesday no one for tomorrow." See GIUFFRE001465.

IMPORTANT MESSAGE			
FOR <u>MR EPSTEIN</u>			
DATE <u>7/9/04</u>		TIME <u>7:50</u> AM	
M. <u>[REDACTED]</u>			
OF <u>[REDACTED]</u>			
PHONE/ MOBILE			
TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>
MESSAGE # <u>[REDACTED]</u> IS			
<u>AVAILABLE AGAIN TUESDAY</u>			
<u>NO ONE FOR TOMORROW</u>			
SA02841			
SIGNED <u>R</u>			

See Schultz Decl. at Composite Exhibit 8, Messages Involving Defendant³. In the investigation of Mr. Epstein's sex crimes against minors, law enforcement was able to confirm identities of underage victims through the use of the names recorded these messages, which were recovered from Epstein's trash.⁴ Accordingly, the messages, and the girls described therein, are fully within the ambit of this Court's Order.

³ GIUFFRE001523; GIUFFRE001427; GIUFFRE001451; GIUFFRE001454; GIUFFRE001460; GIUFFRE001461; GIUFFRE001464; GIUFFRE001465; GIUFFRE001436; GIUFFRE001435; GIUFFRE001472; GIUFFRE001474; GIUFFRE001492; GIUFFRE001553; GIUFFRE001388; GIUFFRE001555; GIUFFRE001556; GIUFFRE001557; GIUFFRE001392; GIUFFRE001526; GIUFFRE001530; GIUFFRE001568; GIUFFRE001536; GIUFFRE001538; GIUFFRE001541; GIUFFRE001546; GIUFFRE001399; GIUFFRE001402; GIUFFRE001405; GIUFFRE001406; GIUFFRE001449; GIUFFRE001409; GIUFFRE001410; GIUFFRE001411; GIUFFRE00; etc.

⁴ Palm Beach Police Officer Recarey was deposed about information pulled by police officers from trash discarded by Epstein from his home:

Q. The next line down is what I wanted to focus on, April 5th, 2005. This trash pull, what evidence is yielded from this particular trash pull?

THE WITNESS: The trash pull indicated that there were several messages with written items on it. There was a message from HR indicating that there would be

Finally, Defendant also refused to answer foundational questions that are necessary to precede questions authorized by this Court, such as:

- “In terms of preparing for this deposition, what documents did you review?” *See* Schultz Decl. at Composite Exhibit 7, Excerpts from July 22, 2016, Deposition of Ghislaine Maxwell at 174:2-4.
- Now, have you ever engaged in oral sex? *Id.* at 18:14-15.
- Q. Did you ever have oral sex with anyone in any of Mr. Epstein's five homes that you've identified other than Mr. Epstein? *Id.* at 20:7-10.
- Did you, in the 1990s and 2000s, engage in sexual activities other than intercourse with women other than what you have testified to already? *Id.* at 89:24-90:3.

an 11:00 appointment. There were other individuals that had called during that day.

Q. And when you would -- when you would see females' names and telephone numbers, would you take those telephone numbers and match it to -- to a person?

THE WITNESS: We would do our best to identify who that person was.

Q. And is that one way in which you discovered the identities of some of the other what soon came to be known as victims?

THE WITNESS: Correct.

See Schultz Decl. at Composite Exhibit 3, Excerpts of June 21, 2016 Deposition of Detective Recarey at pg. 42:14-43:17. Recarey went on to describe the importance of the information:

Q. Did you find names of other witnesses and people that you knew to have been associated with the house in those message pads?

THE WITNESS: Yes.

Q. And so what was the evidentiary value to you of the message pads collected from Jeffrey Epstein's home in the search warrant?

THE WITNESS: It was very important to corroborate what the victims had already told me as to calling in and for work.

Id. at 78:25 -79:15.

In sum, Defendant refused to answer important questions relating to the following topics that were authorized by this Court's Order: (1) Defendant's information relating to and knowledge of the circumstances of Johanna Sjoberg performing massages and sex acts upon Epstein; (2) Defendant's information relating to and knowledge of the circumstances relating to the abuse of Maria Farmer and her sister by Defendant and Epstein; (3) Defendant's information relating to and knowledge of any lists or records of girls who gave "massages" to Epstein; (4) Defendant's involvement with massages (or related documents) showing Defendant's knowledge of, and involvement in, the scheduling of underage girls for massage and sex with Epstein, and any destruction of evidence related to these massages (or related records); (5) foundational questions that were necessary precedent to asking questions authorized by this Court's Order; and (6) all related questions that arise out of any response Defendant provides within the parameters of the Court's June 20, 2016, Order.

DISCUSSION

The Court should compel Ms. Maxwell to answer questions in the topic areas where she refused to answer during her recent deposition. Topics 1 - 4 above are central parts of this case, and Topics 5 and 6 link directly to central parts of this case. Ms. Giuffre, and now other knowledgeable witnesses, have explained and testified that Defendant not only had knowledge of Epstein's massages and sexual activity with others, but she actively facilitated the sexual massages through recruiting young females and underage girls for the purpose of "massage" and sexual activity. And proof that Defendant both had knowledge of, and was involved in, these schemes and encounters, will further help prove that Defendant's statements to the press that Virginia's allegations were "obvious lies" was itself an obvious lie.

The questions Defendant refused to answer fall squarely within this Court's earlier order. Defendant can have no legitimate basis for obstructing the search for truth by refusing to answer. The Court should, again, compel Defendant to answer all these questions. See Fed. R. Crim. P. 37(a)(3)(B)(i); see, e.g., *Kelly v. AI Tech.*, No. 09 CIV. 962 LAK MHD, 2010 WL 1541585, at *20 (S.D.N.Y. Apr. 12, 2010) ("Under the Federal Rules, when a party refuses to answer a question during a deposition, the questioning party may subsequently move to compel disclosure of the testimony that it sought. The court must determine the propriety of the deponent's objection to answering the questions, and can order the deponent to provide improperly withheld answers during a continued deposition" (internal citations omitted)). Of course, the party objecting to discovery must carry the burden of proving the validity of its objections, particularly in light of "the broad and liberal construction afforded the federal discovery rules" *John Wiley & Sons, Inc. v. Book Dog Books, LLC*, 298 F.R.D. 184, 186 (S.D.N.Y. 2014). For purposes of a deposition, the information sought "need not be admissible at the trial if the discovery appears reasonably calculated to lead to the discovery of admissible evidence." *Chen-Oster v. Goldman, Sachs & Co.*, 293 F.R.D. 557, 561 (S.D.N.Y. 2013) (citing Fed.R.Civ.P. 26(b)(1)).

Defendant cannot claim that such questions were outside the scope of this Court's order, as they directly relate to (1) her knowledge of individuals who provided "massage" to Epstein and (2) her knowledge of sexual activities of others with or involving Epstein. Defendant's knowledge of the individuals involved in the sex/"massages" relating to Epstein, and her knowledge about the sex/"massage" related to Epstein is precisely what this Court directed her to answer. See also, *Condit v. Dunne*, 225 F.R.D. 100, 113 (S.D.N.Y. 2004) (in defamation case, "Plaintiff is hereby ordered to answer questions regarding his sexual relationships in so far as

they are relevant to a defense of substantial truth, mitigation of damages, or impeachment of plaintiff.”); *Weber v. Multimedia Entm't, Inc.*, No. 97 CIV. 0682 PKL THK, 1997 WL 729039, at *3 (S.D.N.Y. Nov. 24, 1997) (“While discovery is not unlimited and may not unnecessarily intrude into private matters, in the instant case inquiry into private matters is clearly relevant to the subject matter of the suit. Accordingly, plaintiff Misty Weber shall respond to defendants’ interrogatories concerning her sexual partners”). Moreover, generally speaking, instructions from attorneys to their clients not to answer questions at a deposition should be “limited to [issues regarding] privilege.” *Morales v. Zondo, Inc.*, 204 F.R.D. 50, 54 (S.D.N.Y. 2001). In this case, defense counsel once again ranged far beyond the normal parameters of objections and gave instructions directly in contravention of this Court’s Order directing Defendant to answer exactly the type of questions posed to her.

In light of Defendant’s willful refusal to comply with this Court’s Order directing Defendant to answer questions related to the Court’s June 20, 2016, Order, including topics enumerated above, Ms. Giuffre also seeks attorneys’ fees and costs associated with bringing this motion, as well as fees and costs associated with re-taking Defendant’s deposition.

CONCLUSION

Defendant should be ordered to sit for a follow-up deposition and directed to answer questions regarding the topics enumerated above.

Dated: July 29, 2016

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

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

Meredith Schultz (Pro Hac Vice)
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

Bradley J. Edwards (Pro Hac Vice)
FARMER, JAFFE, WEISSING,
EDWARDS, FISTOS & LEHRMAN, P.L.
425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301
(954) 524-2820

Paul G. Cassell (Pro Hac Vice)
S.J. Quinney College of Law
University of Utah
383 University St.
Salt Lake City, UT 84112
(801) 585-5202⁵

⁵ This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah for this private representation.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 29th day of July, 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.

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

/s/ Sigrid S. McCawley
Sigrid S. McCawley

United States District Court
Southern District of New York

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

_____/

**DECLARATION OF MEREDITH SCHULTZ IN SUPPORT OF
PLAINTIFF'S MOTION TO ENFORCE THE COURT'S ORDER AND DIRECT
DEFENDANT TO ANSWER DEPOSITION QUESTIONS FILED UNDER SEAL**

I, Meredith L. Schultz, declare that the below is true and correct to the best of my knowledge as follows:

1. I am an associate with the law firm of Boies, Schiller & Flexner LLP and duly licensed to practice in Florida and before this Court pursuant to this Court's March 28, 2016 Order granting my Application to Appear Pro Hac Vice.

2. I respectfully submit this Declaration in Support of Plaintiff's Motion to Enforce the Court's Order and Direct Defendant to Answer Deposition Questions Filed Under Seal.

3. Attached hereto as Sealed Composite Exhibit 1 are true and correct copies of Excerpts from the May 18, 2016 Deposition of Johanna Sjoberg.

4. Attached hereto as Sealed Composite Exhibit 2 are true and correct copies of Excerpts from the June 24, 2016 Deposition of Tony Figueroa.

5. Attached hereto as Sealed Composite Exhibit 3 are true and correct copies of Excerpts from the June 21, 2016 Deposition of Detective Joseph Recarey.

6. Attached hereto as Sealed Composite Exhibit 4 are true and correct copies of Excerpts from the June 10, 2016 Deposition of Rinaldo Rizzo.

7. Attached hereto as Sealed Composite Exhibit 5 are true and correct copies of Excerpts from the June 1, 2016 Deposition of John Alessi.
8. Attached hereto as Sealed Exhibit 6 is a true and correct copy of June 20, 2016 Order from Judge Sweet.
9. Attached hereto as Sealed Composite Exhibit 7 are true and correct copies of Excerpts from the July 22, 2016 Deposition of Ghislaine Maxwell.
10. Attached hereto as Sealed Composite Exhibit 8 is a true and correct copy of Messages Involving Defendant.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Meredith L. Schultz
Meredith L. Schultz, Esq.

Dated: July 29, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Meredith Schultz

Meredith Schultz (Pro Hac Vice)
Meredith Schultz (Pro Hac Vice)
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

Bradley J. Edwards (Pro Hac Vice)
FARMER, JAFFE, WEISSING,
EDWARDS, FISTOS & LEHRMAN, P.L.
425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301
(954) 524-2820

Paul G. Cassell (Pro Hac Vice)
S.J. Quinney College of Law
University of Utah
383 University St.
Salt Lake City, UT 84112
(801) 585-5202¹

¹ This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah for this private representation.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 29th day of July, 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 to all parties of record via transmission of the Electronic Court Filing System generated by CM/ECF.

Laura A. Menninger, Esq.
Jeffrey Pagliuca, 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
jpagliuca@hmflaw.com

/s/ Meredith L. Schultz
Meredith L. Schultz

COMPOSITE
EXHIBIT 1
(File Under Seal)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----x
VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----x

May 18, 2016

9:04 a.m.

C O N F I D E N T I A L

Deposition of JOHANNA SJOBERG, pursuant to notice, taken by Plaintiff, at the offices of Boies Schiller & Flexner, 401 Las Olas Boulevard, Fort Lauderdale, Florida, before Kelli Ann Willis, a Registered Professional Reporter, Certified Realtime Reporter and Notary Public within and for the State of Florida.

1 Q. Did you observe her to be young when you
2 met her?

3 MS. MENNINGER: Objection, vague as to
4 time.

5 THE WITNESS: All of the women were
6 generally young. I did not know the ages of
7 really anyone, so...

8 BY MS. McCAWLEY:

9 Q. How many massages did Jeffrey receive on
10 average in a given day?

11 MS. MENNINGER: Objection, foundation.

12 THE WITNESS: Three a day.

13 BY MS. McCAWLEY:

14 Q. Let me back up for a moment.

15 How long did you work for Jeffrey and
16 Ghislaine?

17 MS. MENNINGER: Objection, leading and
18 foundation.

19 THE WITNESS: I believe it was five years,
20 2001 to 2006.

21 BY MS. McCAWLEY:

22 Q. And how many massages did Epstein receive
23 per day on average?

24 MS. MENNINGER: Objection, foundation.

25 THE WITNESS: Three.

1 to object and then you can still answer. No
2 one is going to stop you from answering. I
3 just need to get the objection on the record,
4 in the same way she needs to be able to talk
5 before you. My apologies. I'm not trying to
6 cut you off, but I am supposed to get it in
7 before you answer.

8 BY MS. McCAWLEY:

9 Q. Did Jeffrey ever tell you why he received
10 so many massages from so many different girls?

11 MS. MENNINGER: Objection, hearsay.

12 BY MS. McCAWLEY:

13 Q. You can answer.

14 A. He explained to me that, in his opinion,
15 he needed to have three orgasms a day. It was
16 biological, like eating.

17 Q. And what was your reaction to that
18 statement?

19 A. I thought it was a little crazy.

20 Q. And what did -- do you recall what -- when
21 you observed the other females giving massages, do
22 you recall what they would dress like? Did they
23 wear scrubs or did they typically wear normal
24 clothes?

25 A. Normal clothes.

1 camera?

2 MS. MENNINGER: Objection, leading.

3 THE WITNESS: Yes.

4 BY MS. McCAWLEY:

5 Q. Was there anything you were supposed to do
6 in order to get the camera?

7 MS. MENNINGER: Objection, leading.

8 THE WITNESS: I did not know that there
9 were expectations of me to get the camera until
10 after. She had purchased the camera for me,
11 and I was over there giving Jeffrey a massage.
12 I did not know that she was in possession of
13 the camera until later.

14 She told me -- called me after I had left
15 and said, I have the camera for you, but you
16 cannot receive it yet because you came here and
17 didn't finish your job and I had to finish it
18 for you.

19 BY MS. McCAWLEY:

20 Q. And did you -- what did you understand her
21 to mean?

22 A. She was implying that I did not get
23 Jeffrey off, and so she had to do it.

24 Q. And when you say "get Jeffrey off," do you
25 mean bring him to orgasm?

1 A. Yes.

2 Q. Did Ghislaine ever describe to you what
3 types of girls Jeffrey liked?

4 A. Model types.

5 Q. Did Ghislaine ever talk to you about how
6 you should act around Jeffrey?

7 A. She just had a conversation with me that I
8 should always act grateful.

9 Q. Did Jeffrey ever tell you that he took a
10 girl's virginity?

11 A. He did not tell me. He told a friend of
12 mine.

13 Q. And what do you recall about that?

14 MS. MENNINGER: Objection, hearsay,
15 foundation.

16 THE WITNESS: He wanted to have a friend
17 of mine come out who was cardio-kickboxer
18 instructor. She was a physical trainer.

19 And so I brought her over to the house,
20 and he told my friend Rachel that -- he said,
21 You see that girl over there laying by the
22 pool? She was 19. And he said, I just took
23 her virginity. And my friend Rachel was
24 mortified.

25

1 exposed her bra, and she grabbed it and pulled it
2 down.

3 Q. Anything else?

4 A. That was the conversation that he had told
5 her that he had taken this girl's virginity, the
6 girl by the pool.

7 Q. Okay. Did Maxwell ever say to you that it
8 takes the pressure off of her to have other girls
9 around?

10 A. She implied that, yes.

11 Q. In what way?

12 A. Sexually.

13 Q. And earlier Laura asked you, I believe, if
14 Maxwell ever asked you to perform any sexual acts,
15 and I believe your testimony was no, but then you
16 also previously stated that during the camera
17 incident that Maxwell had talked to you about not
18 finishing the job.

19 Did you understand "not finishing the job"
20 meaning bringing Jeffrey to orgasm?

21 MS. MENNINGER: Objection, leading, form.

22 BY MS. McCAWLEY:

23 Q. I'm sorry, Johanna, let me correct that
24 question.

25 What did you understand Maxwell to mean

1 when she said you hadn't finished the job, with
2 respect to the camera?

3 MS. MENNINGER: Objection, leading, form.

4 THE WITNESS: She implied that I had not
5 brought him to orgasm.

6 BY MS. McCAWLEY:

7 Q. So is it fair to say that Maxwell expected
8 you to perform sexual acts when you were massaging
9 Jeffrey?

10 MS. MENNINGER: Objection, leading, form,
11 foundation.

12 THE WITNESS: I can answer?

13 Yes, I took that conversation to mean that
14 is what was expected of me.

15 BY MS. McCAWLEY:

16 Q. And then you mentioned, I believe, when
17 you were testifying earlier that Jeffrey told you a
18 story about sex on the plane. What was that about?

19 MS. MENNINGER: Objection, hearsay.

20 THE WITNESS: He told me one time Emmy was
21 sleeping on the plane, and they were getting
22 ready to land. And he went and woke her up,
23 and she thought that meant he wanted a blow
24 job, so she started to unzip his pants, and he
25 said, No, no, no, you just have to be awake for

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

AFFIDAVIT

STATE OF FLORIDA)
COUNTY OF)

I, _____, being first
duly sworn, do hereby acknowledge that I did
read a true and certified copy of my deposition
which was taken in the case of GIUFFRE V.
MAXWELL, taken on the 18th day of May, 2016,
and the corrections I desire to make are as
indicated on the attached Errata Sheet.

CERTIFICATE

STATE OF FLORIDA)
COUNTY OF)

Before me personally appeared

_____,
to me well known / known to me to be the
person described in and who executed the
foregoing instrument and acknowledged to and
before me that he executed the said instrument
in the capacity and for the purpose therein
expressed.

Witness my hand and official seal, this
_____ day of _____, 20____.

(Notary Public)

My Commission Expires:

COMPOSITE
EXHIBIT 2
(File Under Seal)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE: 15-cv-07433-RWS

VIRGINIA GIUFFRE,
Plaintiff,

v.

GHISLAINE MAXWELL,
Defendant.

_____ /

VIDEOTAPED DEPOSITION OF TONY FIGUEROA

Volume 1 of 2

Pages 1 - 157

Taken at the Instance of the Defendant

DATE: Friday, June 24, 2016

TIME: Commenced: 8:59 a.m.
Concluded: 1:22 p.m.

PLACE: Southern Reporting Company
B. Paul Katz Professional Center
(SunTrust Building)
One Florida Park Drive South
Suite 214
Palm Coast, Florida 32137

REPORTED BY: LEANNE W. FITZGERALD, FPR
Florida Professional Reporter
Court Reporter and Notary Public

1 Q I guess my question is: Did she ever tell
2 you that she had started as a regular masseuse for
3 him and then transitioned to something other than a
4 masseuse?

5 A No. She never said that it transitioned.
6 But she ended up explaining to me what had happened
7 before, so...

8 Q What has -- what is that?

9 A That her and Ms. Maxwell and Jeffrey would
10 obviously be doing stuff, all three of them
11 together. Like I said, that they would all go out
12 to clubs to pick up girls and try and find them to
13 bring back for Jeffrey. And then she told me about
14 how, like I said, her and Ms. Maxwell and Jeffrey
15 were all intimate together on multiple occasions.

16 Q When did she tell you this?

17 A I'm not exactly sure on the dates.

18 Q Was it while you were still together?

19 A Yes.

20 Q Did you -- had you met Ms. Maxwell?

21 A Yeah, I had met her a couple of times.

22 Q When did you meet Ms. Maxwell?

23 A Dates, I'm unsure of. But it was pretty
24 much, like I said, at Jeffrey's house in the
25 kitchen.

1 Foundation. Vague as to time and place.

2 BY MR. EDWARDS:

3 Q Sorry. Let me rephrase the question.

4 During this 2001 period, if you were
5 driving Virginia and another girl to the house, what
6 type of girls would you be driving?

7 MS. MENNINGER: Objection. Form.

8 Foundation.

9 A Pretty much like young-looking teenager
10 girls. I mean, 16, 17. Really pretty. You know.

11 BY MR. EDWARDS:

12 Q All right. How did you know that that's
13 what was being requested, that that age range and
14 that look and that's what was --

15 A I just assumed that that's what most guys
16 are into, you know, so...

17 Q Girls who looked like Virginia?

18 A Yeah.

19 Q All right. When you would bring girls
20 over to the house, were you looking for some
21 professional masseuse or somebody with massage
22 experience?

23 A Like I said, I would just get friends that
24 I knew from school, so...

25 Q And that's what Jeffrey wanted?

1 you can think to one of the occasions where you
2 brought a girl into the kitchen other than
3 Virginia --

4 A Uh-huh (affirmative).

5 Q -- and Ms. Maxwell is in the kitchen, did
6 you and this other girl that you were bringing over
7 sit there and together have this small talk with
8 Ms. Maxwell?

9 A Yeah.

10 MS. MENNINGER: Objection. Form.
11 Foundation.

12 A Yes.

13 BY MR. EDWARDS:

14 Q And how long would you and one of these
15 other girls sit there and have this small talk with
16 Ms. Maxwell?

17 A No more than, like, 10 or 15 minutes.

18 Q All right. And what were you waiting for?

19 A Pretty much her to take them upstairs.
20 And then I would leave.

21 Like, I would wait for them to be, like,
22 "All right. Well, we're ready."

23 And I would be, like, "All right. See you
24 later." And then I'd leave. And they would go do
25 whatever.

1 MS. MENNINGER: Objection. Form.
2 Foundation.

3 A For Jeffrey.

4 BY MR. EDWARDS:

5 Q All right. Let me fix this. Ghislaine --
6 when Ghislaine Maxwell would call you during the
7 time that you were living with Virginia, she would
8 ask you what, specifically?

9 MS. MENNINGER: Objection. Form.
10 Foundation.

11 A Just if I had found any other girls just
12 to bring to Jeffrey.

13 BY MR. EDWARDS:

14 Q Okay.

15 A Pretty much every time there was a
16 conversation with any of them, it was either asking
17 Virginia where she was at, or asking her to get
18 girls, or asking me to get girls.

19 Q All right. Let's go to that second
20 category you just identified, which is asking
21 Virginia to get girls. How many times were you in a
22 room where specifically Ghislaine Maxwell would ask
23 Virginia to bring girls?

24 A None that I can recall.

25 Q Okay. How many times -- when you say they

1 Q Okay. Any of the girls that you are aware
2 of having gone to the house -- either because you
3 brought them or Virginia -- as you sit here today,
4 do you believe any of them were brought over to be a
5 legitimate masseuse?

6 MS. MENNINGER: Objection. Form.
7 Foundation. Opinion.

8 A Nope.

9 BY MS. MENNINGER:

10 Q All right. How long after Virginia left
11 to go to Thailand did you continue to bring girls to
12 Jeffrey Epstein?

13 A Not, like, at all. Maybe, like, once.
14 Like I said, pretty much after she left and did not
15 come back, he was gone, I think, also. And then he
16 came back and was, like, "Oh, where is Virginia?"
17 And that was pretty much, like I said, he was just
18 throwing in, "Can you bring somebody by," just to
19 make it seem like he wanted me to still be around.
20 I was, like -- and pretty much after she was gone,
21 that was basically it.

22 Q All right. You described that every time
23 that you would bring girls, Jeffrey Epstein would
24 pay you \$200 apiece; correct?

25 A Uh-huh (affirmative).

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

CERTIFICATE OF OATH

STATE OF FLORIDA)
)
COUNTY OF FLAGLER)

I, the undersigned authority, certify that TONY FIGUEROA personally appeared before me on July 5, 2016, and was duly sworn.

WITNESS my hand and official seal this 5th day of July, 2016.

Leanne W. Fitzgerald
Notary Public - State of Florida
My Commission No. FF060921
Expires: February 8, 2018

Digital Certificate Authenticated
By Symantec

EXHIBIT 6
(File Under Seal)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 6-20-16

-----X
VIRGINIA L. GUIFFRE,

Plaintiff,

- against -

15 Civ. 7433 (RWS)

OPINION

GHISLAINE MAXWELL,

Defendant.
-----X

A P P E A R A N C E S:

Counsel for Plaintiffs

BOEIS, SCHILLER & FLEXNER LLP
401 East Las Olas Boulevard, Suite 1200
Fort Lauderdale, FL 33301
By: Sigrid S. McCawley, Esq.
Meredith L. Schultz, Esq.

Counsel for Defendants

HADDON, MORGAN AND FOREMAN, P.C.
150 East Tenth Avenue
Denver, CO 80203
By: Laura A. Menninger, Esq.
Jeffrey S. Pagliuca, Esq.

Sweet, D.J.

Eight discovery motions are currently pending before this court.

1. Plaintiff Virginia Giuffre ("Giuffre" or "Plaintiff") has moved for an order of forensic examination, ECF No. 96. As set forth below, this motion is granted in part and denied in part.
2. Defendant Ghislaine Maxwell ("Maxwell") or ("Defendant") has moved to compel Plaintiff to disclose alleged on-going criminal investigations by law enforcement, ECF No. 101. As set for below, this motion is denied.
3. Plaintiff has moved to compel Defendant to answer deposition questions, ECF No. 143. This motion is granted.
4. Defendant has moved to compel non-privileged documents, ECF No. 155. As set forth below, this motion is denied.
5. Plaintiff has moved for leave to serve three deposition subpoenas by means other than personal service, ECF No. 160. As set forth below, this motion is granted in part and denied in part.
6. Defendant has moved to compel attorney-client communications and work product, ECF No. 164. As set forth below, this motion denied.

7. Plaintiff has moved to exceed the presumptive ten deposition limit, ECF No. 172. As set forth below, this motion is granted in part and denied in part.
8. Plaintiff has moved for leave to file an opposition brief in excess of the 25 pages permitted under this Court's Individual Rules of Practice. This motion is granted.

I. Prior Proceedings

Familiarity with the prior proceedings and facts of this case as discussed in the Court's prior opinions is assumed. See Giuffre v. Maxwell, No. 15 Civ. 7433 (RWS), 2016 WL 831949 (S.D.N.Y. Feb. 29, 2016); Giuffre v. Maxwell, No. 15 Civ. 7433 (RWS) (S.D.N.Y. May 2, 2016).

Plaintiff filed her motion for clarification of the Court's March 17, 2016 Order and for forensic examination on April 13, 2016. By Order dated April 15, 2016, the motion for clarification was denied on the basis that further clarification was unnecessary. Oral argument was held with respect to forensic examination on May 12, 2016, at which time the matter was deemed fully submitted.

Defendant filed her motion to compel Plaintiff to disclose ongoing criminal investigations by law enforcement, or in the alternative to stay proceedings, on April 18, 2016. Oral argument was heard and the motion granted in part and denied in part on April 21, 2016. Plaintiff was directed to submit the relevant materials for in camera review. Plaintiff did so on April 28, 2016.

Plaintiff filed her motion to compel Defendant to answer deposition questions on May 5, 2016. Oral argument was held on May 12, 2016, at which time the matter was deemed fully submitted.

Defendant filed her motion to compel non-privileged documents on May 20, 2016. By Order dated May 23, 2016, the motion was set for argument on June 2, 2016. The motion was taken on submission on that date. Defendant filed a reply on June 6, 2016.

Plaintiff filed her letter motion for leave to serve three depositions subpoenas by means other than personal service. By Order dated May 27, 2016, the motion was set for argument on June 2, 2016. The motion was taken on submission on that date.

Defendant filed her motion to compel attorney-client communications and work product on May 26, 2016. By Order dated May 27, 2016, the motion was set for argument on June 2, 2016. The motion was taken on submission on that date. Defendant filed a reply on June 6, 2016.

Plaintiff filed her motion to exceed the presumptive ten deposition limit on May 27, 2016. By Order dated June 6, 2016, the motion was set returnable on June 16, 2016, at which time the motion was deemed fully submitted.

Plaintiff filed her motion for leave to file excess pages on June 1, 2016.

II. Applicable Standards

Rule 26 "create[s] many options for the district judge . . . [to] manage the discovery process to facilitate prompt and efficient resolution of the lawsuit." Crawford-El v. Britton, 523 U.S. 574, 599, 118 S. Ct. 1584, 1597, 140 L. Ed. 2d 759 (1998). It "vests the trial judge with broad discretion to tailor discovery narrowly and to dictate the sequence of discovery." Crawford-El v. Britton, 523 U.S. 574, 598, 118 S.

Ct. 1584, 1597, 140 L. Ed. 2d 759 (1998). The District Court may expand or limit the permitted number and time limits of depositions, direct "the time, place, and manner of discovery, or even bar discovery on certain subjects," and may "set the timing and sequence of discovery." Id. at 598-99; Fed. R. Civ. P. 26(b)(2)(A).

Consequently, the Court has wide discretion in deciding motions to compel. See Grand Cent. P'ship. Inc. v. Cuomo, 166 F.3d 473, 488 (2d Cir.1999). Federal Rule of Civil Procedure 26 states:

Parties may obtain discovery regarding any nonprivileged matter that is relevant to any party's claim or defense— including the existence, description, nature, custody, condition, and location of any documents or other tangible things and the identity and location of persons who know of any discoverable matter. For good cause, the court may order discovery of any matter relevant to the subject matter involved in the action.

Fed. R. Civ. P. 26. If a party objects to discovery requests, that party bears the burden of showing why discovery should be denied. Freydl v. Meringolo, 09 Civ. 07196(BSJ)(KNF), 2011 WL 256608-7, at *3 (S.D.N.Y. June 16, 2011).

III. The Motion For an Order of Forensic Examination Is Granted in Part and Denied in Part

Federal Rule of Civil Procedure 26(f)(3)(C) requires the parties to state their views and proposals as to preservation of electronically stored information ("ESI") and the form of production of ESI. Fed. R. Civ. P. 26(f)(3)(C). Defendant having admitted to deletion practices that indicate relevant documents and also refused to detail document search methods, good cause exists to warrant court supervised examination of her electronic devices. Accordingly, Plaintiff's motion is granted in part,

Defendant is ordered to collect all ESI by imaging her computers and collecting all email and text messages on any devices in Defendant's possession or to which she has access that Defendant used between the period of 2002 to present. Defendant is further directed to run mutually-agreed upon search terms related to Plaintiff's requests for production over the aforementioned ESI and produce responsive documents within 21 days of distribution of this opinion.

IV. The Motion to Compel Plaintiff to Disclose Ongoing Criminal Investigations is Denied

The public interest privilege "exists to encourage witnesses to come forward and provide information in criminal investigations carried out by . . . [law enforcement] without fear that the information will be disclosed." Sanchez by Sanchez v. City of New York, 201 A.D.2d 325, 326, 607 N.Y.S.2d 321 (1994). A party seeking disclosure of such information "first must demonstrate a compelling and particularized need for access" beyond "[g]eneral and conclusory allegations." Id. The Court then weighs application of the qualified privilege by balancing the need for production against the potential harm to the public from disclosure. Id.

After review of the materials in camera, the qualified public interest privilege as set forth in Sanchez has been established with respect to the submitted documents. Defendant has articulated no need for the documents. Accordingly, the balance weighs in favor of the privilege, and the motion to compel is denied. To preserve the record, Plaintiff is directed to file under seal a comprehensive copy of the log and documents within 21 days of distribution of this opinion.

V. The Motion to Compel Defendant to Answer Deposition Questions is Granted

Plaintiff seeks to compel Defendant to answer questions regarding her knowledge of adult sexual activity, which defense counsel instructed Defendant not to answer during her deposition.

"Where a party objects to a discovery request, the objecting party bears the burden of demonstrating specifically how, despite the broad and liberal construction afforded the federal discovery rules, each request is not relevant or how each question is overly broad, burdensome or oppressive by submitting affidavits or offering evidence revealing the nature of the burden." John Wiley & Sons, Inc. v. Book Dog Books, LLC, 298 F.R.D. 184, 186 (S.D.N.Y. 2014) (citations, internal quotation marks and brackets omitted).

Defendant has submitted that she has not put her private affairs at issue, and that such questions are highly intrusive. Notwithstanding, the questions are directed to reveal relevant answers regarding Defendant's knowledge of Plaintiff's allegations. That knowledge goes directly to the truth or falsity of the alleged defamation, a key element of Plaintiff's claim.

Furthermore, privacy concerns are alleviated by the protective order in this case, drafted by Defendant.

Defendant is ordered to answer questions relating to Defendant's own sexual activity (a) with or involving Jeffrey Epstein ("Epstein"), (b) with or involving Plaintiff, (c) with or involving underage females known to Epstein or who Defendant believed or intended might become known to Epstein, or (d) involving or including massage with individuals Defendant knew to be, or believed might become, known to Epstein. Defendant is also directed to answer questions relating to her knowledge of sexual activities of others (a) with or involving Epstein, (b) with or involving Plaintiff, (c) with or involving underage females known to Epstein or who Defendant believed were known or might become known to Epstein, or (d) involving or including massage with individuals Defendant knew to be or believed might become known to Epstein.¹ The scope of Defendant's answers are not bound by time period, though Defendant need not answer questions that relate to none of these subjects or that is clearly not relevant, such as sexual activity of third-parties who bear no knowledge or relation to the key events, individuals, or locations of this case.

¹ Each of the aforementioned lists are disjunctive.

VI. The Motion to Compel Non-Privileged Documents is Granted in Part and Denied in Part

Defendant has sought to compel the following documents: (1) attorney-client communications regarding media advice; (2) pre-existing documents transmitted to counsel; (3) documents shared with or communicated to unidentified third parties; (4) documents primarily for the purpose of providing business advice; (5) documents subject to an unidentified common interest or joint defense protection.

Plaintiff has represented that all responsive "attachments" Defendant seeks to compel have been produced. Accordingly, this request is denied.

Defendant seeks to compel attorney-client communications that include "third parties" on the basis that Plaintiff's privilege log is deficient for identifying individuals as "professionals retained by attorneys to aid in the rendition of legal advice." A review of Plaintiff's privilege log shows Plaintiff has expressly claimed privilege, described the nature of the withheld documents, communications, and tangible things not produced, and generally logged communications in compliance with Federal Rule of Civil Procedure 26(b)(5)(A)(ii). "Unless

the client waives privilege, an attorney or his or her employee, or any person who obtains without the knowledge of the client evidence of a confidential communication *made between the attorney or his or her employee and the client in the course of professional employment*, shall not disclose, or be allowed to disclose such communication, nor shall the client be compelled to disclose such communication." N.Y. C.P.L.R. 4503 (McKinney) (emphasis added). The conduct explicitly described by statute as privileged does not operate as waiver, and again Defendant has provided no factual basis to suggest Plaintiff has misrepresented the identity or role of the third-parties listed. Defendant's request is denied.

Defendant's challenge to the common interest privilege claims is likewise unavailing. Regardless of whether Plaintiff has reflexively claimed the common interest privilege in each entry does not vitiate the otherwise applicable privilege claims made, and Defendant has provided no factual foundation to establish waiver or failure of the other claimed privileges.

Finally, with respect to the media and business advice communications, Defendant has marshaled no evidence to support her speculation that the documents logged as privileged are improperly withheld other than the fact that one member of

Plaintiff's legal team is an author. Plaintiff has represented to the Court and via a detailed privilege log that the communications in question are privileged. Stan Pottinger, the author in question, is a barred attorney of record in this case, incomparable to Defendant's media agent (and non-attorney) Ross Gow. That Pottinger has written non-legal material, or even whether his "primary occupation in the most recent years [is] as a novelist," is irrelevant to whether his communication with Plaintiff as her counsel was for the purpose of providing legal advice. Similarly, Bradley Edwards, who Defendant has already challenged, is an attorney of record in this case, and Defendant has provided no evidence other than the fact of his representation of Plaintiff's non-profit to doubt that the communications logged are privileged.

Having provided no grounds to doubt the sworn representations of Plaintiff's counsel, Defendant's motion to compel these communications is denied. Defendant is granted leave to refile the motions with respect to media and business advice on the basis of relevant and non-specious factual support. Court intervention should not be invoked to resolve routine discovery matters on the basis of a supposition of bad faith. Further filing of frivolous or vexatious motions lacking sufficient factual support to support a colorable argument (or

on the basis of misrepresented or false facts or law) will be met with sanctions.

VII. The Motion for Leave to Serve Three Deposition Subpoenas By Means Other than Personal Service is Granted in Part and Denied in Part

Plaintiff seeks to compel subpoenas to serve Nadia Marcinkova, Sarah Kellen, and Jeffrey Epstein. The request is denied with respect to Epstein as moot. No opposition having been filed and the testimony of Marcinkova and Kellen being relevant to falsity of the defamation at issue, the motion is granted with respect to Marcinkova and Kellen.

VIII. The Motion to Compel Attorney-Client Communications and Work Product is Denied

Defendant argues that "Edwards and Cassell preemptively filed an action against Dershowitz proclaiming they did not violate Rule 11 . . . [and i]n doing so, they voluntarily put at issue and relied on: a) their good faith reliance on information communicated to them by Plaintiff, and b) their work product

showing that their filing was reasonably investigated and substantially justified." Def.'s Reply in Supp. Mot. to Compel all Att'y-Client Comms. and Att'y Work Product at 8-9 (Def.'s Reply on AC"). The Broward County, Florida Court ruled on this argument in Edwards and Cassell v. Dershowitz and Defendant argues in reply that this order is non-binding, and was issued prior to Plaintiff's testimony. Id. at 1.

Defendant was not a party to the Florida case.

Nevertheless, Defendant's argument is nearly identical to Dershowitz's. Defendant argues Plaintiff's testimony arose after the ruling in the Florida case, however, the principle of that argument is the same: Defendant placed her attorney-client communications with Edwards and Cassell at issue by relying on the content of those communications in Edwards and Cassell v. Dershowitz. The Florida Court's ruling is therefore highly relevant privilege has not been waived.² The motion is accordingly denied.

² The Court declines to address the choice of law issue, as application of Florida or New York at-issue doctrines are not outcome determinative in this instance and thus no determination is necessary. Compare Coates v. Akerman, Senterfitt & Eidson, P.A., 940 So. 2d 504, 510 (Fla. Dist. Ct. App. 2006) ("for waiver to occur under the at issue doctrine, the proponent of a privilege must make a claim or raise a defense based upon the privileged matter and the proponent must necessarily use the privileged information in order to establish its claim or defense.") with Chin v. Rogoff & Co., P.C., No. 05 CIV.

IX. The Motion to Exceed the Ten Deposition Limit is Granted in Part and Denied in Part

As of the filing of Plaintiff's reply on June 13, 2016, Plaintiff has deposed Defendant, Ms. Sjoberg, Mr. Alessi, Mr. Rodgers, and Mr. Rizzo and scheduled the depositions of Mr. Epstein, Mr. Gow, [REDACTED], Ms. Kellen, Ms. Marcinkova, Mr. Recarey, and Mr. Brunel. Plaintiff now seeks leave of the Court pursuant to Federal Rule of Civil Procedure 30(2)(A)(i) take three additional depositions: Mrs. Alessi, Mr. Reiter, and newly raised in Plaintiff's reply, Former President Clinton.

Discovery being well under way and depositions having been scheduled for more than ten individuals, the motion is timely. "The court must grant a request to exceed ten depositions unless the additional depositions would be unreasonably cumulative or duplicative, the requesting party had a prior opportunity in discovery to obtain the information sought, or the burden or

8360(NRB), 2008 WL 2073934, at *5 (S.D.N.Y. May 8, 2008) ("New York courts have held that an 'at issue' waiver occurs "where a party affirmatively places the subject matter of its own privileged communication at issue in litigation, so that invasion of the privilege is required to determine the validity of a claim or defense of the party asserting the privilege, and application of the privilege would deprive the adversary of vital information.").

expense of additional depositions would outweigh any likely benefit." In re Weatherford Int'l Sec. Litig., No. 11 CIV. 1646 LAK JCF, 2013 WL 5762923, at *2 (S.D.N.Y. Oct. 24, 2013). Plaintiff proposes limiting the length of the proposed depositions to limit any undue burden that might result. Defendant argues the depositions would be unduly cumulative and duplicative.

This case revolves around factual issues between Plaintiff and Defendant. The testimony of Mrs. Alessi concerning relevant facts may tend to either establish or negate falsity of the allegedly defamatory statement. The limited burden of this additional deposition, further mitigated as Plaintiff proposes, is therefore outweighed by the benefit of resolving this case on the merits. The motion with respect to this additional deposition is granted.

The relevance of the testimony of Mr. Reiter and President Clinton have not been adequately established. The motion as to these two depositions is denied. Defendant's request for costs and fees is denied pursuant to this Court's previous ruling with respect to costs and fees.

X. The Motion for Leave to File Excess Pages is Granted

Plaintiff sought leave to file excess pages in response to Defendant's motion to compel attorney-client communications and work product. To the extent the motion is not moot, leave is granted.

XI. Conclusion


As set forth above: the motion for an order of forensic examination is granted in part and denied in part; the motion to compel to compel Plaintiff to disclose alleged on-going criminal investigations by law enforcement is denied; the motion to compel Defendant to answer deposition questions is granted; the motion to compel non-privileged documents is denied; the motion for leave to serve three deposition subpoenas by means other than personal service is granted in part and denied in part; the motion to compel attorney-client communications and work product is denied; the motion to exceed the presumptive ten deposition limit is granted; the motion for leave to file an opposition brief in excess of the 25 pages permitted under this Court's Individual Rules of Practice is granted. This opinion resolves ECF Nos. 96, 101, 143, 155, 160, 164, 172, and 182.

For purposes of managing the filings in this case, the parties are further directed to comply with the Court's Individual Rules of Practice by providing all future motion papers in their full non-redacted form, complete with related declarations and exhibits, in a single complete bound hard copy delivered to Chambers at the time of filing. All soft-copies must be provided by attachment of a single PDF in its full non-redacted form, including all related declarations and exhibits irrespective of whether each attachment or declaration is intended to be filed under seal. Soft-copies must be provided in addition to, not in lieu of, hard-copies.

This matter being subject to a Protective Order, the parties are directed to meet and confer regarding redactions to this Opinion consistent with that Order. The parties are further directed to jointly file a proposed redacted version of this Opinion or notify the Court that none are necessary within two weeks of the date of receipt of this Opinion.

It is so ordered.

New York, NY
June 20, 2016



ROBERT W. SWEET
U.S.D.J.

**COMPOSITE
EXHIBIT 7
(File Under Seal)**

Confidential

Page 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x
VIRGINIA L. GIUFFRE,

Plaintiff,

-against-

Case No. :
15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendant.

----- x

CONFIDENTIAL

Continued Videotaped Deposition of
GHISLAINE MAXWELL, the Defendant herein,
taken pursuant to subpoena, was held at
the law offices of Boies, Schiller &
Flexner, LLP, 575 Lexington Avenue, New
York, New York, commencing July 22,
2016, 9:04 a.m., on the above date,
before Leslie Fagin, a Court Reporter
and Notary Public in the State of New
York.

MAGNA LEGAL SERVICES
1200 Avenue of the Americas
New York, New York 10026
(866) 624-6221

Confidential

Page 18

1 G. Maxwell - Confidential

2 A. I think everyone here can
3 understand what intercourse is, is when you
4 have sex. I don't know how to say
5 intercourse any other way, having sex with
6 somebody. Perhaps you would like to define
7 it for me.

8 Q. I'm trying to get your definition
9 right now because you are the witness. When
10 you use the term intercourse, what are you
11 referring to?

12 A. I'm referring to a penis entering
13 someone's vagina.

14 Q. Now, have you ever engaged in oral
15 sex?

16 A. In my life?

17 MR. PAGLIUCA: There are specific
18 areas that the court has allowed inquiry
19 into, and those are delineated in the
20 court's order of June 20th. The
21 open-ended "Have you ever engaged in
22 oral sex" is not part of the court's
23 order at page 10, and the court
24 specifically indicated that sexual
25 activity of third parties who bear no

Confidential

Page 20

1 G. Maxwell - Confidential

2 anyone in any of Mr. Epstein's five homes
3 that you have identified?

4 A. Yes.

5 Q. With whom?

6 A. Mr. Epstein.

7 Q. Did you ever have oral sex with
8 anyone in any of Mr. Epstein's five homes
9 that you've identified other than
10 Mr. Epstein?

11 MR. PAGLIUCA: I'm going to
12 instruct you not to answer, unless you
13 tie it to a specific individual related
14 to this case per the court's order.

15 MR. BOIES: I think the court's
16 order specifically permits this question
17 with respect to occasions related to
18 this case. If you instruct her not to
19 answer, all you're going to do is bring
20 her back. That's up to you.

21 MR. PAGLIUCA: It's up to you as
22 the questioner, Mr. Boies. The court's
23 order says the defendant need not answer
24 questions that relate to none of these
25 subjects or that is clearly not relevant

Confidential

Page 78

1 G. Maxwell - Confidential

2 Johanna?

3 A. I would not know. I would say no.

4 Q. Did you engage in sexual activities
5 with Johanna?

6 A. No.

7 Q. Do you know how Johanna came to
8 know Mr. Epstein?

9 A. I met her at her university and she
10 came to answer phones.

11 Q. When you say she came to answer
12 phones, where?

13 A. In Palm Beach.

14 Q. At Mr. Epstein's home in Palm
15 Beach?

16 A. Yes.

17 Q. So is it fair to say that Johanna
18 was initially hired to answer telephones,
19 according to your testimony?

20 MR. PAGLIUCA: This has already
21 been testified to Mr. Boies. We are
22 repeating testimony now.

23 MR. BOIES: I think in the context
24 of the witness' answers, these are fair
25 questions.

Confidential

Page 79

1 G. Maxwell - Confidential

2 Now, I've asked you before, if you
3 want to instruct her not to answer, if
4 you want to go to the judge, we are
5 happy to do that, but I would suggest,
6 in the interest of moving it along, that
7 you stop these speeches.

8 MR. PAGLIUCA: You are not moving
9 it along is the problem, so maybe we
10 should call the court and get some
11 direction here, because I am not going
12 to sit here and rehash the testimony we
13 already gave.

14 MR. BOIES: That's fine.

15 THE VIDEOGRAPHER: The time is
16 10:51 a.m. and we are going off the
17 record.

18 (Whereupon, an off-the-record
19 discussion was held.)

20 THE VIDEOGRAPHER: The time is
21 10:56 a.m. and we are going back on the
22 record. This begins DVD No. 3.

23 MR. BOIES: We have just had a call
24 with Judge Sweet's chambers, Judge Sweet
25 is not available and his chambers

Confidential

Page 81

1 G. Maxwell - Confidential
2 or argue this in front of Judge Sweet.

3 But I will simply start referring
4 you back to the transcript and
5 instructing the witness not to answer
6 when I think we are getting into some
7 things that have been asked and answered
8 already.

9 MR. BOIES: Exactly the procedure
10 that I have proposed from the beginning.
11 If you think a question is out of
12 bounds, instruct not to answer and we
13 will then let the judge decide it.

14 BY MR. BOIES:

15 Q. How did it happen, Ms. Maxwell,
16 that Johanna, who had been hired to answer
17 the phones, ended up giving massages to you
18 and Mr. Epstein?

19 MR. PAGLIUCA: I'm going to
20 instruct you not to answer the question.
21 This has been previously, the subject of
22 your former deposition, it doesn't fall
23 into any of the categories ordered by
24 the court, and so you don't need to
25 answer that.

Confidential

Page 82

1 G. Maxwell - Confidential

2 Q. Was Johanna paid for the massages
3 that she gave you?

4 A. I didn't pay her, so I believe she
5 was paid.

6 Q. Who paid her?

7 A. I don't know who paid her.

8 MR. PAGLIUCA: Again, you've
9 already answered that there was no
10 sexual activity between yourself and
11 Mr. Epstein related to these massages.
12 That's record testimony today. That's
13 within the scope of the court's order.
14 The rest of this is outside the scope of
15 the court's order, and I instruct you
16 not to answer.

17 MR. BOIES: You are taking the
18 position that as long as she said says
19 that a massage did not involve sexual
20 activity, we cannot ask about massages.
21 That's your view?

22 MR. PAGLIUCA: On this particular
23 questioning, yes.

24 BY MR. BOIES:

25 Q. Did Mr. Epstein pay Johanna for the

Confidential

Page 83

1 G. Maxwell - Confidential
2 massages that she gave Mr. Epstein?

3 MR. PAGLIUCA: You just asked this
4 question, and I told her not to answer.
5 I will tell her not to answer again for
6 the same reasons.

7 Q. Do you know how much Mr. Epstein
8 paid Johanna to give massages?

9 MR. PAGLIUCA: Same instruction to
10 the witness. Why do you believe this is
11 within the scope of the court's order?

12 MR. BOIES: Because of the court's
13 reference to massages, and because I
14 think how much a girl who was hired to
15 answer the phone was paid to give a
16 "massage" goes to whether there actually
17 was or was not sexual activity involved.

18 MR. PAGLIUCA: The witness has
19 testified there wasn't.

20 MR. BOIES: Perhaps it will
21 surprise you, I think it should not,
22 that I do not believe in my deposition I
23 need to simply accept her
24 characterization without
25 cross-examination. Now, that's

Confidential

Page 84

1 G. Maxwell - Confidential
2 something the judge can decide, but a
3 question as to how much this young girl
4 was being paid for a "massage", I think
5 goes directly to the issue of sexual
6 activity.

7 MR. PAGLIUCA: Here is the problem,
8 Mr. Boies, at the first deposition,
9 there were very limited instructions not
10 to answer and the witness was not told
11 not to answer questions about how much
12 people were paid or not paid or any of
13 those subject matters. The witness was
14 only instructed not to answer about
15 sexual activity concerning adults in the
16 home.

17 None of this came up during the
18 deposition, and you just don't get a
19 chance to redo the deposition because
20 you feel like you want to.

21 So the judge's order is in the
22 context of the instructions to the
23 witness not to answer in the first
24 deposition, which is simply sexual
25 activity involving adults, which was the

Confidential

Page 89

1 G. Maxwell - Confidential

2 were sex toys or devices used in sexual
3 activities in Mr. Epstein's property in the
4 Virgin Islands?

5 MR. PAGLIUCA: Objection to form
6 and foundation.

7 A. No.

8 Q. Do you know whether Mr. Epstein
9 possessed sex toys or devices used in sexual
10 activities?

11 MR. PAGLIUCA: Objection to form
12 and foundation.

13 A. No.

14 Q. Did you ever assist Mr. Epstein in
15 obtaining sex toys or devices used in sexual
16 activities?

17 MR. PAGLIUCA: Objection to form
18 and foundation.

19 A. No.

20 Q. In the 1990s and 2000s, did you
21 ever have possession of or use sex toys or
22 devices used in sexual activities?

23 A. No.

24 Q. Did you, in the 1990s and 2000s,
25 engage in sexual activities other than

Confidential

Page 90

1 G. Maxwell - Confidential

2 intercourse with women other than what you
3 have testified to already?

4 MR. PAGLIUCA: First of all, I
5 object to the form and foundation and
6 it's also outside of the court's order
7 because it's unclear as you question,
8 and I specifically direct you to the
9 last line of the court's order: Sexual
10 activity of third parties who bear no
11 knowledge or relation to key events,
12 individuals or locations in this case.

13 MR. BOIES: This simply asks yes or
14 no, and I think that it is an
15 appropriate question given some of the
16 witness' prior answers, but there is no
17 point in debating it, because if you
18 instruct her not to answer, the judge
19 will decide whether it's appropriate.

20 MR. PAGLIUCA: I'm just telling you
21 if you tie it to something in this case,
22 I will let her answer.

23 MR. BOIES: Are you instructing her
24 not to answer?

25 MR. PAGLIUCA: Yes, unless you tie

Confidential

Page 99

1 G. Maxwell - Confidential

2 A. I don't recall ever hearing such a
3 thing.

4 Q. You know Mr. Les Wexner, correct?

5 A. I do.

6 Q. Do you know whether or not Maria
7 Farmer was ever at Mr. Wexner's property in
8 Ohio?

9 MR. PAGLIUCA: Can you tell me how
10 that relates to this order, counselor?

11 MR. BOIES: Yes, I think it goes
12 directly to the sexual activity related
13 to Maria Farmer and what Mr. Epstein was
14 doing with Maria Farmer.

15 Again, you can instruct not to
16 answer.

17 MR. PAGLIUCA: I'm trying to
18 understand why you are asking these
19 questions before I --

20 MR. BOIES: I'm asking these
21 questions because these are people who
22 not only have been publicly written
23 about in terms of the sexual activity
24 that they were put into in connection
25 with Mr. Epstein, but the person who

Confidential

Page 100

1 G. Maxwell - Confidential
2 wrote about them is somebody who talked
3 to this witness about it, and I think
4 that this is more than easily understood
5 cross-examination.

6 MR. PAGLIUCA: Your question was,
7 do you know whether or not Maria Farmer
8 was ever at Mr. Wexner's property in
9 Ohio.

10 MR. BOIES: Yes. And if you let
11 her answer, you will see where it leads.
12 If you won't let her answer, the judge
13 is going to determine it. And I just
14 suggest to you that you stop these
15 speeches and stop debating, because you
16 are not going to convince me not to
17 follow-up on these questions. If you
18 can convince the court to truncate the
19 deposition, that's your right, but all
20 you're doing is dragging this deposition
21 out.

22 MR. PAGLIUCA: You have the
23 opportunity to give me a good faith
24 basis why you are asking these
25 questions.

Confidential

Page 101

1 G. Maxwell - Confidential

2 MR. BOIES: I have given you a good
3 faith basis.

4 MR. PAGLIUCA: You haven't.

5 MR. BOIES: Then instruct not to
6 answer.

7 MR. PAGLIUCA: I am giving you the
8 opportunity to say why you are asking
9 the question, and why I'm telling her
10 not to answer and I am entitled to know
11 that.

12 MR. BOIES: You are not entitled to
13 know why I'm asking the question. You
14 are only entitled to know that it
15 relates to the subject matter that I am
16 entitled to inquire about, and I don't
17 think the judge is going to think that,
18 you know, where Mr. Epstein shipped
19 Maria Farmer off to is outside the scope
20 of what I'm entitled to inquire about.

21 THE WITNESS: Can we take a break?

22 MR. BOIES: Only if you commit not
23 to talk to your counsel during the
24 break.

25 THE WITNESS: That's ludicrous.

Confidential

Page 154

1 G. Maxwell - Confidential

2 Q. Insofar as you were aware, did
3 Virginia Roberts ever have a male friend that
4 visited her at the Epstein residences?

5 A. I don't recall ever seeing a man
6 with Virginia. I believe she had a fiance
7 that I was aware of, I think, but that's all.

8 Q. When were you aware that Virginia
9 Roberts had a fiance?

10 A. I can't say I became aware from
11 reading all this stuff, or I was aware of it
12 at the time. I don't know.

13 Q. Did you ever meet Virginia Roberts'
14 fiance?

15 A. I don't think I ever did. I don't
16 recall meeting any men with Virginia.

17 Q. Do you know [REDACTED],

18 [REDACTED]

19 A. I never heard that name before.

20 Q. Have you ever heard the name of
21 Carolyn Andriamo, A-N-D-R-I-A-M-O?

22 A. I don't recollect that name at all.

23 MR. PAGLIUCA: Mr. Boies, those
24 names are on Exhibit 26, which we have
25 already gone over and she said she

Confidential

Page 155

1 G. Maxwell - Confidential

2 didn't recognize those people, so now we
3 are just repeating things that we went
4 over.

5 MR. BOIES: I am in the context of
6 seeing if I can refresh her
7 recollection, because these are women
8 that Mr. Figueroa, who she also does not
9 recall, brought over to Mr. Epstein's
10 residences, and I also want to make a
11 very clear record of what her testimony
12 is and is not right now.

13 Again, you can instruct her not to
14 answer if you wish.

15 MR. PAGLIUCA: I'm trying to get to
16 nonrepetitive questions here. You
17 basically asked the same question three
18 times. Then we get a pile of notes that
19 get pushed up to you, you read those.
20 Then you ask those three times, and then
21 we go to another question. So it's
22 taking an inordinately long amount of
23 time and it shouldn't.

24 MR. BOIES: I think that is a
25 demonstrably inaccurate statement of

Confidential

Page 156

1 G. Maxwell - Confidential
2 what has been going on, and I
3 attribute -- maybe I shouldn't attribute
4 it at all.

5 But if you want to instruct not to
6 answer, instruct not to answer. If you
7 don't, again, all I will do is request
8 that you cease your comments. I can't
9 do that. All I can do is seek sanctions
10 afterwards.

11 BY MR. BOIES:

12 Q. Ms. Maxwell.

13 A. Mr. Boies.

14 Q. What?

15 A. I'm replying. You said Ms.
16 Maxwell, I said Mr. Boies.

17 Q. Do you have a question?

18 A. No.

19 Q. I have a question.

20 A. I'm sure you do.

21 Q. During the time that you were in
22 the property or at the property that
23 Mr. Epstein has in the Virgin Islands, were
24 you aware of Mr. Epstein getting any
25 massages?

Confidential

Page 174

1 G. Maxwell - Confidential

2 court's order.

3 Q. In terms of preparing for this
4 deposition, what documents did you review?

5 MR. PAGLIUCA: To the extent I
6 provided you with any documents to
7 review, I will tell you that's both --
8 it's privileged and I instruct you not
9 to answer.

10 Q. Did your lawyer provide you with
11 any documents to review in preparation for
12 this deposition that refreshed your
13 recollection about any of the events that
14 occurred?

15 MR. PAGLIUCA: You can answer that
16 question.

17 A. No.

18 Q. How many documents did your lawyer
19 provide you with?

20 MR. PAGLIUCA: You can answer.

21 A. One, I believe.

22 Q. One document. Was that a document
23 that had been prepared by your attorney, or
24 was it a document from the past?

25 MR. PAGLIUCA: I will tell you not

Confidential

Page 177

1 G. Maxwell - Confidential

2 MR. PAGLIUCA: Don't answer that
3 question. It's outside the court's
4 order.

5 Q. In 2005, were you aware of any
6 effort to destroy records of messages you had
7 taken of women who had called Mr. Epstein in
8 the prior period?

9 MR. PAGLIUCA: Don't answer that
10 question. It's outside the court's
11 order.

12 MR. BOIES: I said I would give you
13 a break every hour. It's been an hour.

14 MR. PAGLIUCA: Do you want a break
15 or do you want to keep going?

16 THE WITNESS: Keep going.

17 MR. BOIES: What I told you before,
18 you asked for a break every hour. I am
19 happy to give you a break at a fixed
20 time. What I'm not happy to do is
21 interrupt a chain of examination.

22 So if you want a break now, we will
23 take a break now. If you don't want a
24 break now, we will not break for another
25 hour.

Confidential

Page 184

1 G. Maxwell - Confidential

2 Q. Next one is Heidi --

3 A. Tony is Virginia's guy that you
4 asked me about. I don't know Tony.

5 Q. I asked you about a Tony Figueroa.

6 A. Right, I don't know him, so I'm
7 guessing, I don't know him.

8 Q. Nicole?

9 A. No.

10 Q. Colleen?

11 A. No.

12 Q. Crystal?

13 A. I don't know who these people are.

14 Q. Was there a list that was kept of
15 women or girls who provided massages?

16 MR. PAGLIUCA: This has been
17 previously deposed on. This is not part
18 of the court's order, I will tell her
19 not to answer.

20 MR. BOIES: You are going to tell
21 her not to answer a question that says
22 was there a list of women or girls who
23 provided massages?

24 MR. PAGLIUCA: She has been
25 previously deposed on this subject.

Confidential

Page 185

1 G. Maxwell - Confidential

2 MR. BOIES: I think this is
3 squarely in the court's order, but if
4 you instruct her not to answer, you
5 instruct her not to answer.

6 MR. PAGLIUCA: We'll find out.

7 BY MR. BOIES:

8 Q. I take it you don't know the ages
9 of any of these people?

10 A. The ones that I did recognize were
11 roughly my age. The ones I don't know, I
12 wouldn't have a clue.

13 Q. Did you, or insofar as you are
14 aware anyone, maintain a list of females that
15 provided massage services to Mr. Epstein at
16 his residences?

17 MR. PAGLIUCA: Objection to form
18 and foundation.

19 You can answer if you can.

20 A. I don't know anything about a list.

21 Q. Let me go back to Exhibit 28. I
22 want to go down this list, excluding
23 Mr. Epstein himself, and just ask you a
24 series of the same essential questions about
25 each one.

Confidential

Page 197

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

CERTIFICATE

I HEREBY CERTIFY that GHISLAINE
MAXWELL, was duly sworn by me and that the
deposition is a true record of the testimony
given by the witness.



Leslie Fagin

Leslie Fagin,
Registered Professional Reporter
Dated: July 22, 2016

(The foregoing certification of
this transcript does not apply to any
reproduction of the same by any means, unless
under the direct control and/or supervision
of the certifying reporter.)

COMPOSITE
EXHIBIT 8
(File Under Seal)

Lynn & JoJo

① I sent [REDACTED]
mail to their correct address
and called Post office to make
sure all future mail will be sent to them.

② I scheduled the cable company
to come on Thursday. This is their
soonest appointment. Ghislaine asked
me to make ^{an} appointment because
the TV in the Blue Room does not
get a clear reception.

③ SHUTTER COMPANY WILL COME
EARLY THURSDAY TO MEASURE
SHUTTER NEXT TO GHISLAINE'S
DESK. THE SHUTTER WILL NOT
ROLL DOWN. ~~E~~

* BOTH CABLE COMPANY & SHUTTER COMPANY
WILL CALL ME ON MY CELL PHONE TO
MAKE SURE JEFFREY & GHISLAINE ARE NOT
HERE. [REDACTED]

Jeffrey E. Epstein [REDACTED]

301.3101

SA02969

IMPORTANT MESSAGE

FOR Mr Epstein

DATE 01/02/03 TIME 8:54 A.M. ~~P.M.~~

M. [REDACTED]

OF _____

PHONE [REDACTED]

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE Could you please call back, it's very important

SIGNED [REDACTED] 1184

IMPORTANT MESSAGE

FOR JE

DATE 01/02/03 TIME 16:30 A.M. P.M.

M. CAROLINE CASEY

OF _____

PHONE [REDACTED]

AREA CODE _____ NUMBER _____ EXTENSION _____

TELEPHONED	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE _____

SIGNED GM 1184

IMPORTANT MESSAGE

FOR GM

DATE _____ TIME _____ A.M. P.M.

M. _____

OF _____

PHONE [REDACTED]

AREA CODE _____ NUMBER _____ EXTENSION _____

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE [REDACTED] PHONED TO CONFIRM LOCATOR

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR JE

DATE 01/01/03 TIME 21:06 A.M. P.M.

M. [REDACTED]

OF _____

PHONE [REDACTED]

AREA CODE _____ NUMBER _____ EXTENSION _____

TELEPHONED	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE WANTS TO KNOW IF SHE SHOULD RING HER FRIEND [REDACTED] W/IN TONIGHT

SIGNED [REDACTED] SAO01456 1184

IMPORTANT MESSAGE

FOR MR. Epstein

DATE 4/23/04 TIME 6:10 A.M. P.M.

M. [REDACTED]

OF _____

PHONE/
MOBILE _____

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE BY YOUR MOBILE

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR Mr. Maxwell

DATE 4/23/04 TIME 5:37 A.M. P.M.

M. [REDACTED]

OF _____

PHONE/
MOBILE Office

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE _____

SIGNED _____ 1184

#2

IMPORTANT MESSAGE

FOR MR. Epstein

DATE _____ TIME _____ A.M. P.M.

M. [REDACTED]

OF _____

PHONE/
MOBILE _____

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE _____

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR Mr. Maxwell

DATE 4/23/04 TIME 5:37 A.M. P.M.

M. [REDACTED]

OF _____

PHONE/
MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE _____

SAO2827

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR 6m

DATE 4/29/04 TIME 2:00 AM P.M.

M Martha

OF Colonial Bank

PHONE/MOBILE [REDACTED]

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE _____

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR MS. MAXWELL

DATE 04/25/04 TIME 6:55 AM P.M.

M MS. NICOLE HESSE

OF _____

PHONE/MOBILE [REDACTED]

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE RETURNIN YOUR CALL

SIGNED [REDACTED] 1184

IMPORTANT MESSAGE

FOR _____

DATE [REDACTED] TIME _____ AM P.M.

M _____

OF _____

PHONE/MOBILE [REDACTED]

TELEPHONED	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE _____

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR Jeffrey

DATE _____ TIME _____ AM P.M.

M Chislaine

OF _____

PHONE/MOBILE _____

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE would be helpful to have [REDACTED] come to Palm Beach today to stay here and help train new staff with Chislaine

SIGNED _____ SAO2830 1184

IMPORTANT MESSAGE

FOR 05/21/04
 DATE FOR MR EPSTEIN TIME 5:37 AM/PM
 M. [REDACTED]
 OF [REDACTED]
 PHONE/MOBILE [REDACTED]

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE "PLEASE CALL ME"

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR MR EPSTEIN
 DATE _____ TIME 8:30 AM/PM
 M. SARAH
 OF _____
 PHONE/MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE WILL CALL
BACK

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR MR EPSTEIN
 DATE 05/21/04 TIME 4:38 AM/PM
 M. JOHANNA FJOBERG
 [REDACTED]

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE "CALLED"
"CALL BACK"

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR 05/21/04
 DATE TO MR EPSTEIN TIME 12:45 AM/PM
 [REDACTED]

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE CALLED

SAO2833

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR Jeffrey

DATE _____ TIME _____ A.M. P.M.

M Ghislaine

OF called

PHONE/MOBILE _____

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE _____

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR 06/06/04

DATE FOR MR EPSTEIN TIME 7.44 A.M. P.M.

M _____

OF MS. MAXWELL

PHONE/MOBILE _____

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE " CALLED BUT NOT VERY IMPORTANT "

SIGNED R 1184

IMPORTANT MESSAGE

FOR MR EPSTEIN

DATE 06/11/04 TIME 1.48 A.M. P.M.

M [REDACTED]

OF [REDACTED]

PHONE/MOBILE [REDACTED]

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE ' CALL BACK '

SIGNED R 1184

IMPORTANT MESSAGE

FOR MR. EPSTEIN

DATE 6/6/04 TIME 8.57 A.M. P.M.

M TONY

OF _____

PHONE/MOBILE [REDACTED]

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE " WILL BE COMING AT 11 AM TODAY "

SIGNED _____ SAO2836 1184

IMPORTANT MESSAGE

FOR [REDACTED]

DATE _____ TIME _____ A.M. P.M.

M _____

OF [REDACTED]

PHONE/MOBILE [REDACTED]

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE _____

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR SARAH

DATE 6.12.2004 TIME 3.55 A.M. P.M.

M 50 50

OF [REDACTED]

PHONE/MOBILE [REDACTED]

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE CALLED D. SAYING
SOME ONE CALLED
FROM PALM BEACH

SIGNED [Signature] 1184

IMPORTANT MESSAGE

FOR [REDACTED]

DATE _____ TIME _____ A.M. P.M.

M _____

OF _____

PHONE/MOBILE _____

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE she'll be here
at 5.30

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR MR. Epstein

DATE _____ TIME _____ A.M. P.M.

M _____

OF MS. Maxhoff

PHONE/MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE _____

SAO2837

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR MR. EPSTEIN

DATE 7.9.2004 TIME 7.30 AM/PM

M. [REDACTED]

OF [REDACTED]

PHONE [REDACTED]

MOBILE [REDACTED]

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE
CALLER

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR MR. EPSTEIN

DATE 7/9 TIME 8:35 AM/PM

M. [REDACTED]

OF [REDACTED]

PHONE [REDACTED]

MOBILE [REDACTED]

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR SARAH

DATE 7/9/04 TIME 10.36 AM/PM

M. [REDACTED]

OF LESLIE (NY OFFICE)

PHONE [REDACTED]

MOBILE [REDACTED]

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE SHE IS WORKING FROM HOME TODAY PL CALL THE ABOVE # ASAP

SIGNED R 1184

IMPORTANT MESSAGE

FOR MR. EPSTEIN

DATE 7/9 TIME 6:25 AM/PM

M. MS MAXWELL

OF WARREN

PHONE [REDACTED]

MOBILE [REDACTED]

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE PLEASE CALL WHEN POSSIBLE

SIGNED _____ SAO2840 1184

IMPORTANT MESSAGE

FOR SARAH H

DATE 7/10/04 TIME 6:33 AM P.M.

M: [REDACTED]

OF [REDACTED]

PHONE/MOBILE [REDACTED]

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE PL CALL
(CALLED)

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR MR EPSTEIN

DATE [REDACTED] TIME [REDACTED] AM P.M.

M: [REDACTED]

OF [REDACTED]

PHONE/MOBILE [REDACTED]

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE _____

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR SARAH H

DATE 7/9/04 TIME 10:36 AM P.M.

M: [REDACTED]

OF LESLIE (NY OFFICE)

PHONE/MOBILE [REDACTED]

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE SHE IS WORKING
FROM SECONA TUE DAY
PL RECALL THE ABOVE
ASHP

SIGNED R 1184

IMPORTANT MESSAGE

FOR MR EPSTEIN

DATE 7/9/04 TIME 7:50 AM P.M.

M: Mrs MAYRELL E

OF [REDACTED]

PHONE/MOBILE [REDACTED]

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE [REDACTED] IS
AVAILABLE ON TUESDAY
NO ONE FOR TOMORROW

SAO2841

SIGNED R 1184

IMPORTANT MESSAGE

FOR MR. EPSTEIN

DATE MR. EPSTEIN TIME 11 A.M. P.M.

M _____

OF MS. PINYWELL

PHONE/MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE _____

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR JE

DATE _____ TIME 9:30 A.M. P.M.

M _____

OF _____

PHONE/MOBILE _____

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE She said, if she can't drive to the hospital before 4:00 - say 4:00 after 4:00 (6:30 or 7:00) coz she has to say dinner with her grandpa.

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR MR. EPSTEIN

DATE _____ TIME _____ A.M. P.M.

M _____

OF _____

PHONE/MOBILE _____

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE she will see you at 7:30

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR MR. EPSTEIN

DATE _____ TIME 2:48 A.M. P.M.

M _____

OF _____

PHONE/MOBILE _____

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE She said that some ad had messages I said that she's sorry for not seeing you in California

SIGNED _____ SAO01465 1184

IMPORTANT MESSAGE

FOR JEFFREY

DATE AUG 2 TIME 12:45 A.M. P.M.

M. [REDACTED]

OF [REDACTED]

PHONE/MOBILE [REDACTED]

TELEPHONED	<input checked="" type="checkbox"/> PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE THEY ARE AVAILABLE ALL WEEKEND AND ~~EVERY~~ MAY BE

[REDACTED]

SIGNED NICKI WOODS 1184

IMPORTANT MESSAGE

FOR MR EPSTEIN

DATE 7/25/04 TIME 5:08 A.M. P.M.

M. _____

OF SNYDER

PHONE/MOBILE [REDACTED]

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE "RETURNING YOUR CALL"

SIGNED Ry 1184

IMPORTANT MESSAGE

FOR SARA

DATE AUG 2 TIME 2:00 A.M. P.M.

M. [REDACTED]

OF [REDACTED]

PHONE/MOBILE [REDACTED]

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	<input checked="" type="checkbox"/>

MESSAGE Please call

IN REFERENCE TO

the framed photo

we I moved them

over the Maxwell's

request.

SIGNED NICKI WOODS 1184

IMPORTANT MESSAGE

FOR MR EPSTEIN

DATE 7/25/04 TIME 1:48 A.M. P.M.

M. _____

OF MS MAXWELL

PHONE/MOBILE _____

TELEPHONED	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE "TELL HIM TO CALL ME"

SAO01464

SIGNED Am 1184

SC1184 1001

IMPORTANT MESSAGE

FOR Jo Jo
 DATE 8/16/04 TIME 12:00 P.M.

M [REDACTED]
 OF [REDACTED]
 PHONE/MOBILE [REDACTED]

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE
Arriving at
Customs at 8115
Need 2 vehicles
(5) people

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR JF
 D [REDACTED] TIME 9:30 A.M.
 M [REDACTED]
 OF [REDACTED]
 PHONE/MOBILE [REDACTED]

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE
will phone again
in 1/2 hr.

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR JF
 DATE [REDACTED] TIME [REDACTED] A.M./P.M.
 M [REDACTED]
 OF EVA
 PHONE/MOBILE [REDACTED]

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR JF
 D [REDACTED] TIME 11:30 A.M.
 M [REDACTED]
 OF [REDACTED]
 PHONE/MOBILE [REDACTED]

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	<input checked="" type="checkbox"/>
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE

SAO2845

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR JEF

DATE 20 Aug TIME 9:10 A.M. P.M.

M _____

OF _____

PHONE/MOBILE _____

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE CALLER

SHE WAS ALL THE INFO

YOU NEED

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR JEF

DATE 20 Aug TIME 8:00 A.M. P.M.

M _____

OF _____

PHONE/MOBILE _____

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE _____

CALL HER BACK

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR JEF

DATE 20 Aug TIME 8:40 A.M. P.M.

M _____

OF _____

PHONE/MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/> PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE Returns your call

SIGNED _____ SAO2848 1184

IMPORTANT MESSAGE

FOR JEF

DATE 20 Aug TIME 3:40 A.M. P.M.

M Christine

OF _____

PHONE/MOBILE

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE SHE LET LARRY GO

THE ONLY FLIGHT TO PB leaves

at 3:15

Not heard from Tom Ford

If you call it means she will pick

up _____ alone in the airport

If you want to change please

SIGNED call GM back 1184

IMPORTANT MESSAGE

FOR ~~MR. EPSTEIN~~

DATE ~~MR. EPSTEIN~~ TIME 2:45 A.M. P.M.

M. ~~MR. EPSTEIN~~

OF ~~MR. EPSTEIN~~

PHONE/MOBILE ~~MR. EPSTEIN~~

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE ~~MR. EPSTEIN~~

SIGNED ~~MR. EPSTEIN~~ 1184

IMPORTANT MESSAGE

FOR J.E.

DATE TIME 9:30 A.M. P.M.

M. Sarah

OF [REDACTED]

PHONE/MOBILE [REDACTED]

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE She said if she can't call you but her left before 4:00 (6:00 or 7:00) b/cz she has birthday dinner w/ her grandpa

SIGNED 1184

IMPORTANT MESSAGE

FOR MR. EPSTEIN

DATE TIME A.M. P.M.

M. Sophie Biddle

OF [REDACTED]

PHONE/MOBILE [REDACTED]

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE she will see you at 7:30

SIGNED 1184

IMPORTANT MESSAGE

FOR MR. EPSTEIN

DATE TIME 2:48 A.M. P.M.

M. [REDACTED]

OF [REDACTED]

PHONE/MOBILE [REDACTED]

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE She said that Sophie got her messages & said that she's sorry for not seeing you in California.

SIGNED SAO2850 1184

IMPORTANT MESSAGE

FOR Sarah

DATE 11-4-04 TIME 2:40 AM PM

M _____

OF _____

PHONE/MOBILE _____

TELEPHONED	<u>PLEASE CALL</u>	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE _____

Return

Call

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR Shirley

DATE 11-4-04 TIME 2:55 AM PM

M _____

OF from Sarah

PHONE/MOBILE _____

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE _____

like to work @ 4:00 PM

if possible

is scheduled

for 5:00 today

SIGNED the _____ 1184

movie is @ 7:30

IMPORTANT MESSAGE

FOR Sarah

DATE 12/6/04 TIME 1:00 AM PM

M _____

OF _____

PHONE/MOBILE _____

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE _____

Please call her

R

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR Mr. J.E.

DATE 12/6/04 TIME 1:30 AM PM

M v. Harry Beller

OF _____

PHONE/MOBILE _____

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE _____

Returning your

Call

SAO2939

R

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR Mr. J.E.

DATE 12/04/04 TIME 7:40 AM

M. [REDACTED]

OF [REDACTED]

PHONE/MOBILE [REDACTED]

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE _____

Please call

him

[Signature]

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR Mr. J.E.

DATE 12/04/04 TIME 4:20 AM

M. G. Maxwell

OF _____

PHONE/MOBILE _____

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE _____

Please call her.

[Signature]

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR Mr. J.E.

DATE 12/04/04 TIME 5:30 AM

M. G. Maxwell

OF _____

PHONE/MOBILE _____

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE _____

Please call her

[Signature]

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR Mr. J.E.

DATE 12/04/04 TIME 5:40 PM

M. J. [REDACTED]

OF [REDACTED]

PHONE/MOBILE [REDACTED]

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE _____

Please call her

[Signature]

SIGNED _____ 1184

SAO2938

IMPORTANT MESSAGE

FOR SARAN

DATE 12/9/04 TIME 10:20 AM PM

[REDACTED]

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE

Scheduling for going
thru Palm Beach
House

SIGNED [Signature] 1184

IMPORTANT MESSAGE

FOR Mr. J E

DATE 12/9/04 TIME 5:00 AM PM

[REDACTED]

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE

Please call him

SIGNED [Signature] 1184

IMPORTANT MESSAGE

FOR Mr. J E

DATE 12/09/04 TIME 8:30 AM PM

[REDACTED]

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE

"Tell him that I
called"

SIGNED [Signature] 1184

IMPORTANT MESSAGE

FOR Mr. J.E

DATE 12/09/04 TIME 8:00 AM PM

Mrs Wexing

OF _____

PHONE/MOBILE _____

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE

Please She will call
back

SAO2943

SIGNED [Signature] 1184

IMPORTANT MESSAGE

FOR J.E.
1.8.05 TIME 4:05 AM
PM

[REDACTED]

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE

Please call me
back!

SIGNED [Signature] 1184

IMPORTANT MESSAGE

FOR Jeffrey
1/8/05 TIME 10:15 AM
PM

[REDACTED]

OF _____

PHONE/
MOBILE _____

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE

please call
her

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR J.E.
DATE 1.8.05 TIME 4:55 AM
PM

Mr. Coppertield

[REDACTED]

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE

Please call him

SIGNED [Signature] 1184

IMPORTANT MESSAGE

FOR Jeffrey
1/8/05 TIME 9:30 AM
PM

DATE Jan 8 TIME _____ AM
PM

Mr. Jean Luc

[REDACTED]

OF _____

PHONE/
MOBILE _____

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE

asking if you
have called
him he has
sth for some
message for you

SIGNED SAO2949 1184

IMPORTANT MESSAGE

FOR J.E.

DATE 2/24/05 TIME 4:18 ^{AM}/_{PM}

M. [REDACTED]

[REDACTED]

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE

Please! Call her
Tomorrow is her
birthday

SIGNED J. 1184

IMPORTANT MESSAGE

FOR J.E.

DATE 2/22 TIME 12:45 ^{AM}/_{PM}

M. [REDACTED]

[REDACTED]

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE

Please! Call her.

SIGNED J. 1184

IMPORTANT MESSAGE

FOR Jeffrey

DATE 2/25/05 TIME 01:10 ^{AM}/_{PM}

M. [REDACTED]

OF [REDACTED]

PHONE/MOBILE [REDACTED]

TELEPHONED	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE

Please call
him back

SIGNED [REDACTED] 1184

SAO2967

IMPORTANT MESSAGE

FOR M. Epstein

DATE 2/24/05 TIME 11:19 ^{AM}/_{PM}

M. [REDACTED]

OF [REDACTED]

PHONE/MOBILE [REDACTED]

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE

She needs Ken's
telephone number.
Call her at
[REDACTED]

SIGNED LER 1184

IMPORTANT MESSAGE

FOR Jeffrey

DATE 2/25/05 TIME 1:39 A.M.

M. Whirlaine

OF _____

PHONE/
MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE _____

Third she called

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR Jeffrey

DATE 2/25/05 TIME 9:42 P.M.

M. _____

OF _____

PHONE/
MOBILE _____

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE _____

She would like to
speak with you.

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR _____

DATE _____ TIME _____ A.M.

M. _____

OF _____

PHONE/
MOBILE _____

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE _____

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR Jeffrey

DATE 2/25/05 TIME 12/2 P.M.

M. _____

OF _____

PHONE/
MOBILE _____

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE _____

SIGNED _____ 1184

SAO2998

IMPORTANT MESSAGE

FOR Jeffrey

DATE 02/26/05 TIME 11:15 A.M. P.M.

M. [REDACTED]

OF [REDACTED]

PHONE/MOBILE [REDACTED]

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE

Please call her back in 1h 30
She is on the way to the gym
JJ

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR Jeffrey

DATE 02/25/05 TIME 05:50 A.M. P.M.

M. Teen-bee

OF _____

PHONE/MOBILE You have it

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE

Going back to concert section.
What about Paris on Saturday

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR Jeffrey

DATE 2/26/05 TIME 12:00 A.M. P.M.

M. [REDACTED]

OF _____

PHONE/MOBILE _____

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE

Please call her

SIGNED _____ 1184

SAO2968

IMPORTANT MESSAGE

FOR Jeffrey

DATE 2/26/05 TIME 12:21 A.M. P.M.

M. [REDACTED]

OF [REDACTED]

PHONE/MOBILE [REDACTED]

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE

Please call her back

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR J.E.
 DATE 2/27/05 TIME 10:18 ^{A.M.}/_{P.M.}
 M _____
 OF Ms. Maxwell
 PHONE/
 MOBILE _____

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE she is home

SIGNED J. 1184

IMPORTANT MESSAGE

FOR J.E.
 DATE 2/26/05 TIME 4:40 ^{A.M.}/_{P.M.}
 M Geon Luc
 OF _____
 PHONE/
 MOBILE no phone #

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE Please!
call him

SIGNED J. 1184

IMPORTANT MESSAGE

FOR Teffy
 DATE 2/28/05 TIME 12:32 ^{A.M.}/_{P.M.}
 M _____
 OF _____
 PHONE/
 MOBILE _____

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE she is home during
if 2:30 is ok
she needs to
stay in school

IMPORTANT MESSAGE

FOR Teffy
 DATE 2/27/05 TIME 07:45 ^{A.M.}/_{P.M.}
 M Geon Luc
 OF _____
 PHONE/
 MOBILE _____

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE That he
called back

SAO01067

IMPORTANT MESSAGE

FOR Jeffrey
 DATE 2/28/08 TIME 12:14 A.M. P.M.
 M. Darren

OF _____
 PHONE/MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE
He needs to speak with you.

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR Jeffrey
 DATE 2/28/05 TIME 12:10 A.M. P.M.

[REDACTED]

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE
He has sent you some faxes that he would like follow up.

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR Jeffrey
 DATE 2/28/05 TIME 5:30 A.M. P.M.
 M. Whislaine

OF _____
 PHONE/MOBILE _____

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE
Pls call back

SIGNED _____ SAO3000

IMPORTANT MESSAGE

FOR Jeffrey
 DATE 2/27/05 TIME 11:20 A.M. P.M.
 M. Sarah

OF _____
 PHONE/MOBILE _____

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE
Please call her back. She wanted to make sure you know that she is going to meet Whislaine and go with her to the Ranch

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR Jeffrey
DATE _____ TIME 6:05 AM/PM
M. _____
OF _____
PHONE/
MOBILE _____

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE:
Call back

SIGNED Nadia 1184

IMPORTANT MESSAGE

FOR Jeffrey
DATE 2/28/05 TIME 7:11 AM/PM
M. _____
OF _____
PHONE/
MOBILE _____

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE:
_____ is away
Back on Wensday
and she might
have short Friday

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR Jeffrey
DATE 02/28/05 TIME 7:56 AM/PM
M. Keala
OF _____
PHONE/
MOBILE _____

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE:
That she called
please call her
back

SAO3001

IMPORTANT MESSAGE

FOR Christine
DATE 02/28/05 TIME 7:50 AM/PM
M. Christine
OF _____
PHONE/
MOBILE _____

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE:
Please call
back

IMPORTANT MESSAGE

FOR Jeffrey
DATE 3/5/05 TIME 12:20 AM (P.M.)
M Ghislaine

OF _____
PHONE/MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE
Pecno still doesn't answer the phone.

SIGNED AM 1184

IMPORTANT MESSAGE

FOR Jeffrey
DATE 3/5/05 TIME 10:20 AM (P.M.)
M [REDACTED]

OF _____
PHONE/MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE
She had on the phone. Mr. Harvey Weinstein

SIGNED 1184

IMPORTANT MESSAGE

FOR Jeffrey
DATE 3/5/05 TIME 12:22 AM (P.M.)
M [REDACTED]

OF _____
PHONE/MOBILE _____

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE
She has problems with car... could she be here at 2 pm?

SIGNED SAO3002 1184

IMPORTANT MESSAGE

FOR Jeffrey
DATE 3/5/05 TIME 11:50 AM (P.M.)
M Larry Wisocki

OF [REDACTED]
PHONE/MOBILE [REDACTED]

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE
Person for the car will be here in 15 min. to drop off foam and papers

SIGNED 1184

IMPORTANT MESSAGE

FOR Jeffrey
 DATE 3/6/05 TIME 03:00 A.M. P.M.
 M. [REDACTED]
 OF [REDACTED]
 PHONE/MOBILE [REDACTED]

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE
Returning your phone call

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR Jeffrey
 DATE 3/06/05 TIME 11:40 A.M. P.M.
 M. [REDACTED]
 OF [REDACTED]
 PHONE/MOBILE [REDACTED]

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE
That he could deal

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR J. E.
 DATE 3/7/05 TIME 7:30 A.M. P.M.
 M. [REDACTED]
 OF [REDACTED]
 PHONE/MOBILE [REDACTED]

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE
Do you want to see him?

SIGNED J. 1184

IMPORTANT MESSAGE

FOR Ms. R. Maxwell
 DATE 3/06/05 TIME 9:01 A.M. P.M.
 M. [REDACTED]
 OF [REDACTED]
 PHONE/MOBILE [REDACTED]

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE
Left his cell #
 [REDACTED]

SIGNED _____ 1184

SAO01071

IMPORTANT MESSAGE

FOR Sarah

DATE 3/20/05 TIME 1:10 A.M. P.M.

M Haley

OF _____

PHONE/
MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE _____

Left her cell #

SIGNED [Signature] 1184

IMPORTANT MESSAGE

FOR J.E.

DATE 3/18/05 TIME 8:05 A.M. P.M.

M Tell Stacy

OF _____

PHONE/
MOBILE _____

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE _____

SIGNED J. 1184

IMPORTANT MESSAGE

FOR Ms. B. Maxwell

DATE 3/19/05 TIME 3:45 A.M. P.M.

M _____

OF _____

PHONE/
MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE _____

Appointment is at
9:30^{am} tomorrow.
Christine is not
available if it
okay to have
another person.

SIGNED [Signature] 1184

IMPORTANT MESSAGE

FOR J.E.

DATE 3/18/05 TIME 12:55 A.M. P.M.

M Sarah

OF _____

PHONE/
MOBILE _____

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE _____

SAO01474

SIGNED T 1184

IMPORTANT MESSAGE

FOR Jeffrey
 DATE 04/01/05 TIME 12:20 A.M. P.M.
 M Ghislaine

OF _____
 PHONE/MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE Glen has pulled muscle and he is at the hospital "Good Sam" They have called dr. Mostakite and everything has been organized. In this case probably they won't make for lunch.

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR J.E.
 DATE 3/31/05 TIME 7:05 A.M. P.M.
 M Leslie Wexler

OF _____
 PHONE/MOBILE _____

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE _____

SIGNED J. 1184

IMPORTANT MESSAGE

FOR Jeffrey
 DATE 04/01/05 TIME 11:07 A.M. P.M.
 M Cecilia

OF _____
 PHONE/MOBILE _____

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE She had on the phone Mr. Cipriani

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR Jeffrey
 DATE 04/01/05 TIME 07:56 A.M. P.M.
 M Genia

OF _____
 PHONE/MOBILE No number he will call back

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE That he called

SIGNED _____ 1184

SAO2972

IMPORTANT MESSAGE

FOR Jeffrey
 DATE 4/9/05 TIME 02:10 A.M. P.M.
 M. Whiskaine
 OF _____
 PHONE/MOBILE _____

TELEPHONED	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE _____

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR Jeffrey
 DATE 4/9/05 TIME 12:04 A.M. P.M.
 M. _____
 OF _____
 PHONE/MOBILE _____

TELEPHONED	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE _____

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR J.E.
 DATE 4/10/05 TIME 1:20 A.M. P.M.
 M. _____
 OF _____
 PHONE/MOBILE _____

TELEPHONED	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE She went running and back to the gym

SIGNED T. 1184

IMPORTANT MESSAGE

FOR J.E.
 DATE 4/10/05 TIME _____ A.M. P.M.
 M. _____
 OF _____
 PHONE/MOBILE _____

TELEPHONED	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE She went running

SIGNED _____ 1184

SAO2975

IMPORTANT MESSAGE

FOR Jettrey
 DATE 4/9/05 TIME 4:40 AM PM
 M _____
 OF _____
 PHONE/MOBILE _____

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE She is waiting for her friend to call her back. She would like to speak with you

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR Jettrey
 DATE 4/9/05 TIME 5:16 AM PM
 M _____
 OF _____
 PHONE/MOBILE _____

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE _____

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR Jettrey
 DATE 4/11/05 TIME 11:40 AM PM
 M _____
 OF _____
 PHONE/MOBILE _____

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE _____

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR Jettrey
 DATE 4/9/05 TIME 1:05 AM PM
 M Ghislaire
 OF _____
 PHONE/MOBILE _____

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE Please call her back

SIGNED _____ SAO3013

IMPORTANT MESSAGE

FOR J. E.
 DATE 5/9/05 TIME 3:05 AM
 M. [REDACTED]
 OF [REDACTED]
 PHONE/MOBILE [REDACTED]

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE _____

SIGNED J. 1184

IMPORTANT MESSAGE

FOR J. E.
 DATE 5/9/05 TIME 3:06 AM
 M. Joana
 OF [REDACTED]
 PHONE/MOBILE [REDACTED]

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE _____

SIGNED J. 1184

IMPORTANT MESSAGE

FOR JE
 DATE [REDACTED] TIME 4:45 AM
 M. [REDACTED]
 OF [REDACTED]
 PHONE/MOBILE [REDACTED]

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE Thank you

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR JE
 DATE 5/9/05 TIME 2:15 AM
 M. Lowlexon
 OF [REDACTED]
 PHONE/MOBILE [REDACTED]

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL	<input checked="" type="checkbox"/>	SPECIAL ATTENTION	

MESSAGE _____

SIGNED _____ 1184

SAO2980

IMPORTANT MESSAGE

FOR J.E.
 DATE 5/24/05 TIME 9:10 ^{AM} P.M.
 M. Eva

OF _____
 PHONE/MOBILE cell box at home

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE _____

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR J.E.
 DATE 5/19/05 TIME 7:20 ^{AM} P.M.
 M. Mrs Maxwell

OF _____
 PHONE/MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE _____

SIGNED J 1184

IMPORTANT MESSAGE

FOR J.E.
 DATE [REDACTED] TIME 12 ^{AM} P.M.
 M. [REDACTED]

OF [REDACTED]
 PHONE/MOBILE [REDACTED]

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE _____

SIGNED _____ SAO2981

IMPORTANT MESSAGE

FOR J.E.
 DATE [REDACTED] TIME 10:25 ^{AM} P.M.
 M. [REDACTED]

OF _____
 PHONE/MOBILE _____

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input checked="" type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE she got there
late

SIGNED _____

IMPORTANT MESSAGE

FOR Jeffrey
DATE 2/10/05 TIME 12:20 A.M. P.M.
M. Christaine

OF _____
PHONE/
MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE: Glen has pulled muscle and he is at the hospital "Good Sam" They have called dr. Mostabite and everything has been organized. In this case probably they won't make for lunch.

SIGNED _____ 1184

11

IMPORTANT MESSAGE

FOR J.F.
DATE 3/31/05 TIME 7:05 A.M. P.M.
M. Leslie Wexler

OF _____
PHONE/
MOBILE _____

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE _____

SIGNED J. 1184

#16

IMPORTANT MESSAGE

FOR Jeffrey
DATE 04/10/05 TIME 11:07 A.M. P.M.
M. _____

OF _____
PHONE/
MOBILE _____

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE: She had on the phone Mr. Cipriani

SIGNED _____ 1184

SAO2983

IMPORTANT MESSAGE

FOR Mr. Moscow
DATE 07/26/04 TIME 07:50 A.M. P.M.
M. _____

OF _____
PHONE/
MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE: That he called

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR Jeffrey
 DATE 12/9/05 TIME 02:10 A.M./P.M.
 M. Whislaine

OF _____
 PHONE/ MOBILE _____

TELEPHONED	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU	WILL CALL AGAIN	<input checked="" type="checkbox"/>
WANTS TO SEE YOU	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE _____

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR Jeffrey
 DATE 4/9/05 TIME 12:00 A.M./P.M.
 M. _____

OF _____
 PHONE/ MOBILE _____

TELEPHONED	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU	WILL CALL AGAIN	<input checked="" type="checkbox"/>
WANTS TO SEE YOU	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE _____

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR J.E.
 DATE 4/11/05 TIME 1:20 A.M./P.M.
 M. _____

OF _____
 PHONE/ MOBILE _____

TELEPHONED	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE She went running
and back to the gym

SIGNED J. SAO2986 1184

IMPORTANT MESSAGE

FOR J.E.
 DATE 4/11/05 TIME _____ A.M./P.M.
 M. _____

OF _____
 PHONE/ MOBILE _____

TELEPHONED	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE She went running

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR J.E.
 DATE 5/9/05 TIME 3:05 AM
 M. [REDACTED]
 OF [REDACTED]
 PHONE/MOBILE [REDACTED]

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE _____

SIGNED J. 1184

IMPORTANT MESSAGE

FOR J.E.
 DATE 5/9/05 TIME 3:06 AM
 M. Joana
 OF [REDACTED]
 PHONE/MOBILE [REDACTED]

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE _____

SIGNED J. 1184

IMPORTANT MESSAGE

FOR JE
 DATE [REDACTED] TIME 9:45 AM
 M. [REDACTED]
 OF _____
 PHONE/MOBILE _____

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE Thank you

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR JE
 DATE 5/9/05 TIME 12:15 AM
 M. Leowexhon
 OF _____
 PHONE/MOBILE _____

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL	<input checked="" type="checkbox"/>	SPECIAL ATTENTION	

MESSAGE _____

SIGNED _____ 1184

SAO2990

IMPORTANT MESSAGE

FOR J.E.
 DATE 5/24/05 TIME 9:10 ^{AM} P.M.
 M. Eva

OF _____
 PHONE/MOBILE call her at home

TELEPHONED	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE _____

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR J.E.
 DATE 5/19/05 TIME 7:20 ^{AM} P.M.
 M. Mrs Maxwell

OF _____
 PHONE/MOBILE _____

TELEPHONED	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE _____

SIGNED T 1184

IMPORTANT MESSAGE

FOR J.E.
 DA [REDACTED] TIME 12 ^{AM} P.M.
 M. [REDACTED]

OF [REDACTED]
 PHC [REDACTED]
 MOB [REDACTED]

TELEPHONED	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE _____

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR J.E.
 [REDACTED] TIME 10:25 ^{AM} P.M.
 [REDACTED]

OF _____
 PHONE/MOBILE _____

TELEPHONED	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	SPECIAL ATTENTION	<input checked="" type="checkbox"/>

MESSAGE she got there
late

SIGNED _____ 1184

SAO2991

IMPORTANT MESSAGE

FOR Sarah

DATE 6-18-05 TIME 3:10 A.M. P.M.

M. [REDACTED]

OF [REDACTED]

PHONE/MOBILE [REDACTED]

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE _____

SIGNED [Signature] 1184

IMPORTANT MESSAGE

FOR J. E.

DATE 6/13/05 TIME 10:58 A.M. P.M.

M. G. M.

OF _____

PHONE/MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE Please call her back

SIGNED [Signature] 1184

IMPORTANT MESSAGE

FOR Jeffrey

DATE 6/12/05 TIME 12:05 A.M. P.M.

M. [REDACTED]

OF [REDACTED]

PHONE/MOBILE [REDACTED]

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE _____

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR Mr. J. Epstein

DATE 6/11/05 TIME 12:25 A.M. P.M.

M. [REDACTED]

OF _____

PHONE/MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL	<input checked="" type="checkbox"/>	SPECIAL ATTENTION	

MESSAGE _____

SIGNED [Signature] 1184

SAO01078

IMPORTANT MESSAGE

FOR J.E.
 DATE 7/4/05 TIME 6:25 ^{AM} _{PM}
 M _____
 OF G.M.
 PHONE/MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE _____

SIGNED J. 1184

IMPORTANT MESSAGE

FOR J.E.
 DATE 7/4/05 TIME 7:20 ^{AM} _{PM}
 M _____
 OF _____
 PHONE/MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE _____

SIGNED T 1184

IMPORTANT MESSAGE

FOR JE
 DATE _____ TIME 12:30 ^{AM} _{PM}
 M G-
 OF _____
 PHONE/MOBILE _____

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE She called Eduardo -
she's going to have
dinner w/ him - He's not
going to Grand Prix -
but she told her to
call his Secretary to
organize passes -

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR JE
 DATE _____ TIME 10:35 ^{AM} _{PM}
 M _____
 OF _____
 PHONE/MOBILE _____

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE called to say
goodnight

SIGNED _____ SAO01081 1184

IMPORTANT MESSAGE

FOR J.E.

DATE 8/19/05 TIME _____ A.M. P.M.

M Cecilia

OF _____

PHONE/ MOBILE _____

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE
Remanid you about conference call at 9 AM

SIGNED J 1184

IMPORTANT MESSAGE

FOR Jeffrey

DATE 25/07/05 TIME 11:45 A.M. P.M.

M from waxner office

OF _____

PHONE/ MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE
Jim Lucas the head of the text department has answer on aircraft
His number is

[REDACTED]

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR JE

DATE _____ TIME _____ A.M. P.M.

M _____

OF Josanna

PHONE/ MOBILE _____

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE
She doesn't want to camp to the movies, but call her if you want a massage before or after the movie.

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR JE

DATE _____ TIME 9:00 A.M. P.M.

M G-

OF _____

PHONE/ MOBILE _____

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE
She's at 7/5th
please call

SAO01084

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR J.E.
 DATE 8/19/05 TIME 4:12 AM P.M.
 M G.M.

OF _____
 PHONE/MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE she left message on answering machine.

SIGNED J. 1184

IMPORTANT MESSAGE

FOR 8/19/05 7:50 AM P.M.
 DATE Adriana TIME _____
 M _____

OF _____
 PHONE/MOBILE _____

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE key to get information where he has to go to Hampton and how to meet this person? He can be reach on [redacted] cellphone.

SIGNED J. 1184

IMPORTANT MESSAGE

FOR JE
 DATE _____ TIME _____ AM P.M.
 M _____

OF Savoh
 PHONE/MOBILE _____

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input checked="" type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE pleas [redacted] work on Sunday @ 4.00 and @ 4.30

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR 8/19/05 7:55 AM P.M.
 DATE Adriana TIME _____
 M _____

OF _____
 PHONE/MOBILE _____

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE will be with tomorrow at 11:00 AM

SIGNED J. **SA001085** 1184

IMPORTANT MESSAGE

FOR J.F.
 DATE 9/3/05 TIME 9:50 A.M./P.M.
 M Adriana
 OF _____
 PHONE/MOBILE _____

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE I left message
for [redacted] to
confirm for 11:00 AM
and [redacted]
for 4:30 PM

SIGNED J. 1184

IMPORTANT MESSAGE

FOR J.F.
 DATE 8/22/05 TIME 9:20 A.M./P.M.
 M Nicole
 OF _____
 PHONE/MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE _____

SIGNED J. 1184

IMPORTANT MESSAGE

FOR J.F.
 DATE 9/4/05 TIME 12:55 A.M./P.M.
 M [redacted]
 OF [redacted]
 PHONE/MOBILE [redacted]

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE She would like to
reschedule her
time

SIGNED J. 1184

IMPORTANT MESSAGE

FOR J.F.
 DATE 8/22/05 TIME _____ A.M./P.M.
 M GM
 OF _____
 PHONE/MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE _____

SAO01477

SIGNED J. 1184

SC1184 1001

IMPORTANT MESSAGE

FOR M. J. Epstein

DATE 8/23/05 TIME 2:18 A.M. P.M.

M. [REDACTED]

OF _____

PHONE/MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE _____

SIGNED L 1184

IMPORTANT MESSAGE

FOR [REDACTED]

DATE _____ TIME _____ A.M. P.M.

M. _____

OF Swath

PHONE/MOBILE _____

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE Call him back, please

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR M. J. Epstein

DATE 8/22 TIME 4:21 A.M. P.M.

M. [REDACTED]

OF _____

PHONE/MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE Please call her

SIGNED L 1184

IMPORTANT MESSAGE

FOR M. J. Epstein

DATE 8/21 TIME 11:39 A.M. P.M.

M. [REDACTED]

OF _____

PHONE/MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE I cannot work today. [REDACTED] will be here at 4:00 PM.

SAO01449

SIGNED L 1184

IMPORTANT MESSAGE

FOR _____
DATE _____ TIME _____ A.M. P.M.
M. _____
OF _____
PHONE/
MOBILE _____

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE _____
I went to a store to
buy food
I will be back @ 5.00

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR JE
DATE _____ TIME _____ A.M. P.M.
M. _____
OF Adriana
PHONE/
MOBILE _____

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE _____
_____ & _____ ave
continued

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR JE
DATE _____ TIME _____ A.M. P.M.
M. _____
OF _____
PHONE/
MOBILE _____

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE _____
Please call back

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR _____
DATE _____ TIME _____ A.M. P.M.
M. _____
OF _____
PHONE/
MOBILE _____

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE _____
The movie
starts @ 7.15

SIGNED _____ SA001086 1184

IMPORTANT MESSAGE

FOR J.E.
DATE 9/4/05 TIME 3:40 ^{AM} _{PM}
M _____

OF _____
PHONE/
MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE _____

SIGNED J. 1184

IMPORTANT MESSAGE

FOR Mrs. B. Maxwell
DATE 9/4/05 TIME 1:40 ^{AM} _{PM}
M _____

OF _____
PHONE/
MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE She will be here
at 3^{pm} with family.

SIGNED L. 1184

IMPORTANT MESSAGE

FOR J.E.
DATE 9/4/05 TIME 7:25 ^{AM} _{PM}
M Adriana

OF _____
PHONE/
MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE Canceled
She would like to speak
to you. I believe about
college
Should I schedule any
one else?

SIGNED J. 1184

IMPORTANT MESSAGE

FOR Mr. J. Epstein
DATE 9/4/05 TIME 2:08 ^{AM} _{PM}
M _____

OF _____
PHONE/
MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE _____

SIGNED L. SAO01089 1184

IMPORTANT MESSAGE

FOR J.E.

DATE 9/10/05 TIME 11:16 ^{AM}/_{P.M.}

M G.M.

OF _____

PHONE/
MOBILE _____

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE [REDACTED]
got invitation

SIGNED J. 1184

IMPORTANT MESSAGE

FOR J.E.

DATE 9/5/05 TIME 10:25 ^{AM}/_{P.M.}

M [REDACTED]

OF _____

PHONE/
MOBILE _____

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE 5:00 PM
is O.K. with her

SIGNED J. 1184

IMPORTANT MESSAGE

FOR J.E.

DATE 9/10/05 TIME 11:16 ^{AM}/_{P.M.}

M G.M.

OF _____

PHONE/
MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE [REDACTED]
got an invitation

SIGNED J. 1184

IMPORTANT MESSAGE

FOR J.E.

DATE 9/8/05 TIME 4:30 ^{AM}/_{P.M.}

M [REDACTED]

OF _____

PHONE/
MOBILE _____

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE Her new phone #
[REDACTED]

SAO01090

SIGNED J. 1184

IMPORTANT MESSAGE

FOR J.E.

DATE 9/10/05 TIME 12:50 ^{AM}/_{PM}

M. [REDACTED]

OF _____

PHONE/
MOBILE _____

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE
Call her in North Salem

SIGNED J. 1184

IMPORTANT MESSAGE

FOR J.E.

DATE 9/10/05 TIME 11:16 ^{AM}/_{PM}

M. G.M.

OF _____

PHONE/
MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE
decline invitation

SIGNED J. 1184

IMPORTANT MESSAGE

FOR J.E.

DATE _____ TIME _____ ^{A.M.}/_{P.M.}

M. [REDACTED]

OF _____

PHONE/
MOBILE _____

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE
RETURNING YOUR CALL @ 12²⁰

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR J.E.

DATE 9/10/05 TIME 1:15 ^{AM}/_{PM}

M. Adriana

OF _____

PHONE/
MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE
[REDACTED] confirm 4 PM

SAO01091

SIGNED J. 1184

IMPORTANT MESSAGE

FOR J.E.
 DATE 9/11/05 TIME 9:15 ^{AM} _{P.M.}
 M. Adriana
 OF _____
 PHONE/ MOBILE _____

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE
I got a car for

SIGNED J. 1184

IMPORTANT MESSAGE

FOR JE
 DATE _____ TIME _____ ^{AM} _{P.M.}
 M. _____
 OF N
 PHONE/ MOBILE _____

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE
Adriana hasn't confirmed
_____ @ 11.00 yet so
she is keeping _____
on hold in case _____
doesn't call back

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR Mr. J. Epstein
 DATE 9/11/05 TIME 10:01 ^{AM} _{P.M.}
 M. _____
 OF _____
 PHONE/ MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/> PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE

SIGNED L 1184

IMPORTANT MESSAGE

FOR J.E.
 DATE 9/10/05 TIME 10:10 ^{AM} _{P.M.}
 M. Adriana
 OF _____
 PHONE/ MOBILE _____

TELEPHONED	PLEASE CALL	
CAME TO SEE YOU	WILL CALL AGAIN	
WANTS TO SEE YOU	RUSH	
RETURNED YOUR CALL	SPECIAL ATTENTION	

MESSAGE
_____ will be at
11:AM
Do you want me to
call _____

SIGNED J. SAO01093 1184

1184 71

IMPORTANT MESSAGE

FOR J.E.

DATE 10/1/05 TIME 2:50 ^{A.M.}/_{P.M.}

M [REDACTED]

OF _____

PHONE/
MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE _____

SIGNED J 1184

IMPORTANT MESSAGE

FOR J.E.

DATE 10/1/05 TIME 9:30 ^{A.M.}/_{P.M.}

M SARAH

OF _____

PHONE/
MOBILE _____

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE _____

... confidential
at 11 AM
and ending - 4 PM

SIGNED J 1184

IMPORTANT MESSAGE

FOR J.E.

DATE 10/1/05 TIME 7:10 ^{A.M.}/_{P.M.}

M [REDACTED]

OF _____

PHONE/
MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE _____

SIGNED T 1184

IMPORTANT MESSAGE

FOR J.E.

DATE 10/1/05 TIME 10:15 ^{A.M.}/_{P.M.}

M [REDACTED]

OF _____

PHONE/
MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE _____

SAO01469

SIGNED T 1184

IMPORTANT MESSAGE

FOR J. E.
 DATE 10/2/05 TIME 10:40 ^{A.M.}/_{P.M.}
 M. Sarah
 OF _____
 PHONE/
 MOBILE _____

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE [REDACTED] is sick
and she can't
come today

SIGNED J. 1184

IMPORTANT MESSAGE

FOR J. E.
 DATE 10/2/05 TIME 7:20 ^{A.M.}/_{P.M.}
 M. [REDACTED]
 OF _____
 PHONE/
 MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE _____

SIGNED J. 1184

IMPORTANT MESSAGE

FOR Mr. J. Epstein
 DATE Oct. 2 05 TIME 12:30 ^{A.M.}/_{P.M.}
 M. [REDACTED]
 OF _____
 PHONE/
 MOBILE _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE [REDACTED]

SIGNED [Signature] 1184

IMPORTANT MESSAGE

FOR J. E.
 DATE 10/2/05 TIME 10:20 ^{A.M.}/_{P.M.}
 M. [REDACTED]
 OF _____
 PHONE/
 MOBILE _____


TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE _____

SAO01470

SIGNED J. 1184

IMPORTANT MESSAGE


FOR J. E.
 DATE 10/31/05 TIME 2:50 AM PM
 M 
 O _____
 P _____
 M _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE _____

SIGNED J. 1184

IMPORTANT MESSAGE

FOR J. E.
 DATE 10/31/05 TIME 9:05 AM PM
 M 
 O _____
 P _____
 M _____

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	


MESSAGE Can you call him
at this # between
10⁰⁰ - 10³⁰ PM

SIGNED J. 1184

IMPORTANT MESSAGE


FOR J. E.
 DATE 10/31/05 TIME 4:10 AM PM
 M Sarah
 O _____
 P _____
 M _____

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE  will be
1/2 hour late

SIGNED _____ 1184

IMPORTANT MESSAGE

FOR Mr. J. Epstein
 DATE 10-2-05 TIME 12:30 AM PM
 M 
 O _____
 P _____
 M _____

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE _____

SIGNED _____ SAO01471

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
VIRGINIA L. GIUFFRE,
Plaintiff,
v.
GHISLAINE MAXWELL,
Defendant.
-----X

15-cv-07433-RWS

**DEFENDANT’S SUBMISSION REGARDING “SEARCH TERMS” AND NOTICE OF
COMPLIANCE WITH COURT ORDER
CONCERNING FORENSIC EXAMINATION OF DEVICES**

Laura A. Menninger
Jeffrey S. Pagliuca
HADDON, MORGAN, AND FOREMAN, P.C.
East 10th Avenue
Denver, CO 80203
303.831.7364

Defendant Ghislaine Maxwell (“Ms. Maxwell”) respectfully files the following Submission Concerning Search Terms and Notice of Compliance with Court Order regarding Forensic Examination of Devices, as follows:

INTRODUCTION

Defense counsel has already run the amended list of search terms proposed by Plaintiff on each applicable device and as to each email account to which Ms. Maxwell has access. Based on those searches, not one single additional responsive and non-privileged document has been identified. Ms. Maxwell’s original search for responsive documents was complete at the time it was conducted in February 2016. The recent forensic imaging and searches have merely confirmed as much. Plaintiff has sent defense counsel, this Court and Ms. Maxwell on a costly, time-consuming and burdensome wild goose chase that has yielded not so much as a single goose feather. It is time to call off the hunt.

Submission Concerning Search Terms

The Requests for Production

Ms. Maxwell served Responses and Objections to Plaintiff’s First Discovery Requests on February 8, 2016. Those requests sought, *inter alia*:

- all communications with thirteen specific witnesses, namely Jeffrey Epstein, Virginia Roberts, Prince Andrew, Ross Gow, Alan Dershowitz, Emmy Taylor, Sarah Kellen, Glenn and Eva Dubin, Jean Luc Brunel, Nadia Marcincova and Bill and Hillary Clinton (RFPs 1, 2, 3, 4, 6, 17, 32 and 37)
- documents relating to various topics include massages (RFP 5 and 29), travel records (RFPs 8, 9, 14 and 39), a civil deposition in 2010 (RFP 19), and Ms. Maxwell’s professional affiliation with Jeffrey Epstein (RFPs 10, 11, 12, 15, 20, 23, 24, 30);
- documents relating to any contact between Ms. Maxwell and law enforcement (RFP 13 and 38);
- photos of females under the age of 18 (RFP 7), of any time inside a home or aircraft of Epstein (RFP 15), of Plaintiff (RFP 18);

- documents relating otherwise to Plaintiff including her hospital records (RFP 25), passport (RFP 26), monetary payments made to her (RFP 27), her employment (RFP 28), and any person to whom she gave a massage (RFP 29).

Ms. Maxwell conducted a thorough search of her email systems and her devices prior to her production on February 8, 2016. All documents identified as responsive were reviewed by counsel and either produced or placed on a privilege log. The First Responses were the subject of litigation in March and April 2016. This Court limited the scope of a number of the requests (*see* Transcript of March 17, 2016 and Order of April 15, 2016 (Doc. # 098), and Ms. Maxwell later produced, pursuant to this Court's Order, documents that originally had been withheld pursuant to privilege. As of April 18, Ms. Maxwell's production of documents responsive to Plaintiff's First Request for Production of Documents was complete.

Plaintiff served a Second set of Requests for Production on April 14. Those Requests primarily concerned police reports about Plaintiff's various contacts with law enforcement and how the defense was able to obtain those publicly-available documents (RFP's 1-5, 19). The Second Requests also sought:

- Joint Defense Agreements with Mr. Epstein and Mr. Dershowitz (RFPs 6, 7, 9 and 10) and communications with Mr. Dershowitz's counsel (RFP 11);
- "all documents concerning Virginia Giuffre" (RFP 12);
- any contracts with or agreement for legal fees to be paid by Epstein (RFP 13-15);
- documents concerning public statements made by Ms. Maxwell (RFP 17-18).

Again, Ms. Maxwell and her counsel conducted a thorough search and produced any responsive non-privileged documents.

To date, Ms. Maxwell has produced 1,130 pages of documents. Litigation concerning whether the searches conducted were thorough enough then ensued leading to the instant submission.

Search Terms

On June 20, 2016, this Court Ordered

Defendant is ordered to collect all ESI by imaging her computers and collecting all email and text messages on any devices in Defendant's possession or to which she has access that Defendant used between the period of 2002 to present. Defendant is further directed to run *mutually-agreed upon search terms related to Plaintiff's requests for production* over the aforementioned ESI and produce responsive documents within 21 days of distribution of this opinion.

On June 30, 2016, Plaintiff's counsel provided a list of 368 search terms. See Menninger

Decl. Ex. A. Plaintiff's proposal included astoundingly broad terms, to wit:

- "Terramar" -- both the name of Ms. Maxwell's non-profit and [REDACTED]
- [REDACTED]
- [REDACTED]
- "max*" -- part of Ms. Maxwell's last name, as well as all of her paternal relatives' names.
- "GM" -- Ms. Maxwell's initials.
- common words such as "hotel," suite, villa, "bed," "bath," and "lingerie."

Plaintiff's originally proposed search terms would literally hit on every single email from either Ms. Maxwell's personal or her business email addresses, as well as every document related to the non-profit, The Terramar Project, that Ms. Maxwell founded and runs.

Plaintiff's originally proposed terms also failed to relate to the actual discovery requests upon which they were to be based. For search terms 124-341, Plaintiff took her own Rule 26 disclosures, separated the first and last names of each witness she had identified, and asked that they be searched individually (along with "wild card character searches"), even though, as described above there were only 13 specific witnesses for whom Plaintiff had actually sought all communications. For example, Plaintiff wanted the names Bill, Mark, Phil, Bob, Mike and Todd

searched yet there is no RFP related to those names, nor the vast majority of the other listed first and surnames.¹

By correspondence of July 14, Ms. Maxwell's counsel specifically identified the problematic terms, agreed to a limited list, and requested a substantive conferral call on this issue. *See* Menninger Decl., Ex. B. In that correspondence, Defendant's counsel gave specific reasons for the objection to a number of the terms that were problematic in that they called for the search of common words, names or phrases that would likely result pulling documents completely unrelated to this case. *Id.* Counsel also suggested proposed limiting terms with respect to names of individuals to appropriately limit the scope and target the search. *Id.* (suggesting limitations on searches of names to "make some effort to match them to actual people who have some relationship to this case (like first name /3 last name or some parts thereof)").

After explaining the appropriate and well-reasoned objections to certain terms, defense Counsel agreed to search *over 110 of Plaintiff's proposed search terms*, despite the fact that many of those terms were objectionable. *Id.* ("Although many of your other search terms are a

¹ On or about June 27, 2016, Plaintiff's counsel Bradley Edwards and Defendant's counsel Jeffery Pagliuca held a telephone meet and confer conference on a number of issues. Among the issues raised by Mr. Pagliuca was the overbreadth of the proposed search terms. The discussion was left that Mr. Edwards would talk with Plaintiff's team of lawyers to narrow the scope, as Mr. Pagliuca understood it. Thus, contrary to the representation in the Motion, Ms. Maxwell's counsel *did inform* Plaintiff's counsel of their disagreement with the proposed search terms. As well, Mr. Pagliuca informed Mr. Edwards that because he, Laura Menninger and Ms. Maxwell were all traveling on vacations in the weeks before and after the 4th of July holiday, that they would need additional time to comply with the Court's Order and provide the production. Mr. Pagliuca and Mr. Edwards agreed that productions would be made prior to Ms. Maxwell's second deposition, scheduled by agreement on July 22, 2016.

Based on this discussion, defense counsel was blindsided when they received the Motion for Sanctions, anticipating that they would soon be receiving a substantially limited and modified list of proposed search terms to permit search and production prior to the July 22 deposition. In the interim, all of Ms. Maxwell's electronic devices had been sent for imaging.

Defense counsel corresponded with Plaintiff's counsel upon receipt of the Motion for Sanctions, requesting that it be withdrawn (without prejudice), pending completion of conferral on the search terms as required by this Court's specific and general orders on conferral. It appears there was a miscommunication between Plaintiff's own counsel on this issue, as well as between counsel for both of the parties; but, it was clearly just that – a miscommunication and misunderstanding on where things stood.

tremendous stretch, I can agree to them in the interest of getting the search done on a timely basis.”).² Having heard nothing from Plaintiff’s counsel by the close of business on July 15, 2016, Ms. Maxwell’s counsel ran the 110 of Plaintiff’s proposed terms on the forensic images of Ms. Maxwell’s electronic devices and email accounts, including both [REDACTED]

Because of the breadth of the 110 terms proposed by Plaintiff, the original search resulted in **approximately 9,000 documents** and communications containing one or more term in the content or meta-data. The volume of the documents is explained by the breadth of the terms searched, resulting in pulling non-relevant, non-responsive information from Ms. Maxwell’s electronic devices and emails, including thousands of underwater photos related to Ms. Maxwell’s non-profit, the word “passport” due to the fact that the Terramar Project includes an “ocean passport” program, as well as numerous family holiday photos. All of the documents were reviewed individually by counsel for Ms. Maxwell for responsiveness to Plaintiff’s discovery request, pursuant to this Court’s Order. Of those documents, the only responsive documents were either communications between Ms. Maxwell and current counsel or were communications with, or prepared at the request of, Ms. Maxwell’s UK Counsel, Philip Barden,

² Defense counsel specifically requested a telephone conference to discuss any of the other terms, noting that the search would need to proceed over the weekend to permit review and production of any documents prior to Defendant’s deposition on July 22, 2016. *Id.* (“***I am available by telephone today and tomorrow to discuss the issues raised herein.*** If I do not hear from you, I will presume that you are in agreement to the remainder of the terms being run on the devices.”). Plaintiff’s counsel did not timely respond to the July 14, 2016 letter, the clearly articulated counter-proposed terms (over 110 of the 368 proposed by Plaintiff), or set a time to discuss the articulated objections to other terms. Instead, on July 18, 2016, Plaintiff’s filed a response to the Letter Motion to Strike for Failure to Confer, inexplicably and inaccurately claiming 1) that defendant is running “secret search terms” and 2) claiming that defendant’s counsel refused to confer *despite the clear conferral letter and request for telephone conference.* See July 18, 2016 Letter to the Court from M. Shultz.

³ Plaintiff also requested searches of old email accounts of Defendant [REDACTED]. Ms. Maxwell has been able to access the [REDACTED] account and it contains no responsive documents. Ms. Maxwell has been unable to access [REDACTED] and does not recall ever using that account.

in anticipation of a potential lawsuit in the United Kingdom. *See* Menninger Decl. at paragraph 8. The documents concerning Mr. Barden have been added to the privilege log. *Id.*

Upon receipt of Plaintiff's Response to the Letter Motion to Strike for Plaintiff's failure to confer, the undersigned reiterated that there were no "secret search terms" and that Plaintiff's own proposed terms were used, as limited. *See* Menninger Decl., Ex. C. Defense counsel also reiterated the request for Court Ordered conferral, again offering times to confer that would permit any additional terms to be run, documents reviewed and production of non-privileged responsive documents (if any) prior to Ms. Maxwell's July 22, 2016 second deposition. *Id.*

Plaintiff's Revised List of Search Terms

Finally, on July 19, 2016, Plaintiff's counsel agreed to a telephone call with the undersigned to discuss the lack of responsive documents to the 110 search terms already run, as well as the remaining objectionable terms and their purported relevance. During the call, Plaintiff's counsel argued that their proposed search terms numbered 124-341 were relevant because they were witness names "related to massages" (RFP 5). That justification was clearly lacking because the terms included names like "Dore Louis," who is a lawyer for witness Johana Sjoberg and whose wife works with Ms. McCawley. They also included Plaintiff's treating physician Karen Kutikoff, Plaintiff's literary agent Jarred Weisfeld, Plaintiff's mother Lynn Miller, Detective Joe Recarey, Mr. Edwards' law partner Scott Rothstein, and countless other people who would have no knowledge of any massages nor otherwise were related to the discovery requests at issue. *See* Menninger Decl. Ex. A. Moreover, Ms. Maxwell already had run the Plaintiff's proposed terms related to massages, including "massage," "masseuse," "masseur," and "therapy." In effect, Plaintiff proposed search terms sought to expand her discovery requests from communications with a discrete set of individuals to *all communications*

with anyone that Plaintiff believed was or might be a witness, although no discovery requests called for such communications.

Consequently, during the conferral call, Plaintiff's counsel agreed to withdraw the vast majority of objectionable terms. She also agreed to supply a list of witnesses who she believes truly might in some way relate to "massages" and submit that to defense counsel. *See* Menninger Decl., Ex. D. Plaintiff thereafter provided an additional 66 terms, all names, which Plaintiff claims she has some reason to believe are "related to massages." Menninger Decl. Ex. E. Ms. Maxwell does not believe that searching these terms is appropriate, because, for example, the names include a journalist (Vicky Ward), Mr. Epstein's elderly secretary, and various business people that form part of Plaintiff's false narrative regarding her "sex trafficking," and searching for names in the absence of a topic (i.e., massages) is well-beyond the actual requests for production.

Nevertheless, Ms. Maxwell did in fact run all of the names proposed by Plaintiff against the forensic images of Ms. Maxwell's computers and her email accounts. The second search yielded 284 additional documents, each of which were reviewed individually by counsel for Ms. Maxwell. Menninger Decl. paragraph 8 and 9. Again, not a single responsive, non-privileged document was located; the vast majority of documents were pleadings from this case.

The complete list of terms run against Ms. Maxwell's electronic devices and email accounts as agreed to by the parties is attached. Menninger Decl., Ex. F. Compliance with the Court's Order to run agreed to terms was completed by July 21, 2016, prior to Ms. Maxwell's second deposition.

Other Email Accounts

In addition to her home and work email addresses, Plaintiff also requested that Ms. Maxwell access two other email accounts that Plaintiff believes are associated with Ms. Maxwell, specifically [REDACTED].

Ms. Maxwell has used the [REDACTED] account as a “spam account,” i.e., an account address to use when registering for retail sales notifications and the like. Nevertheless, undersigned counsel gained access to that account and searched all of the documents contained therein, including in folders for inbox, trash and sent. The email account contained no responsive documents.

Ms. Maxwell does not recall ever using an account with [REDACTED]. She has attempted unsuccessfully to access that account. Counsel’s own attempts to access the account yields a message: “The email address you entered is not an [REDACTED] email address or ID.” Counsel for Ms. Maxwell has no reason to believe that the account exists.

Conclusion

WHEREFORE, counsel for Ms. Maxwell through a certified forensic examiner has:

- a. imaged the hard-drives of Ms. Maxwell’s devices;
- b. imaged the servers containing emails from Ms. Maxwell’s personal and business email accounts;
- c. searched those forensic images for the search terms *proposed by Plaintiff* – including 110 from the first list and the additional 66 terms sent on July 19.

Counsel for Ms. Maxwell has reviewed the documents obtained from the searches described above as well as thoroughly searched the email account [REDACTED].

No additional responsive, non-privileged documents were identified in that process. An updated privilege log reflecting communications with Mr. Barden has been produced to Plaintiff.

Ms. Maxwell hereby respectfully requests that:

- i. Plaintiff Virginia Giuffre's Motion for an Adverse Inference Instruction Pursuant to Rule 37(b), (e) and (f), Fed. R. Civ. P., be stricken;
- ii. Ms. Maxwell be awarded the costs of engaging the forensic examiner.

Dated: August 1, 2016.

Respectfully submitted,

/s/ Laura A. Menninger

Laura A. Menninger (LM-1374)
Jeffrey S. Pagliuca (*pro hac vice*)
HADDON, MORGAN AND FOREMAN, P.C.
150 East 10th Avenue
Denver, CO 80203
Phone: 303.831.7364
Fax: 303.832.2628
lmenninger@hmflaw.com

Attorneys for Ghislaine Maxwell

CERTIFICATE OF SERVICE

I certify that on August 1, 2016, I electronically served this *Defendant's Submission regarding "Search Terms" and Notice of Compliance with Court Order Concerning Forensic Examination of Computer Device* via ECF on the following:

Sigrid S. McCawley
Meredith Schultz
BOIES, SCHILLER & FLEXNER, LLP
401 East Las Olas Boulevard, Ste. 1200
Ft. Lauderdale, FL 33301
smccawley@bsfllp.com
mschultz@bsfllp.com

Bradley J. Edwards
FARMER, JAFFE, WEISSING, EDWARDS,
FISTOS & LEHRMAN, P.L.
425 North Andrews Ave., Ste. 2
Ft. Lauderdale, FL 33301
brad@pathtojustice.com

Paul G. Cassell
383 S. University Street
Salt Lake City, UT 84112
cassellp@law.utah.edu

J. Stanley Pottinger
49 Twin Lakes Rd.
South Salem, NY 10590
StanPottinger@aol.com

/s/ Nicole Simmons
Nicole Simmons

EXHIBIT A

BOIES, SCHILLER & FLEXNER LLP

401 EAST LAS OLAS BOULEVARD • SUITE 1200 • FORT LAUDERDALE, FL 33301-2211 • PH. 954.356.0011 • FAX 954.356.0022

Meredith L. Schultz, Esq.
E-mail: mschultz@bsfllp.com

June 30, 2016

VIA E-MAIL

Laura A. Menninger, Esq.
HADDON, MORGAN AND FOREMAN, P.C.
150 East 10th Avenue
Denver, Colorado 80203
lmenninger@hmflaw.com

Re: *Guiffre v. Maxwell*
Case No. 15-cv-07433-RWS

Dear Laura,

I write pursuant to this Court's June 20, 2016, Order regarding search and production from Defendant's electronic media. Accordingly, please use IMAP Capable software (or a functional equivalent) to capture all of the sent/received emails from Ms. Maxwell's various email accounts, including but not limited to the following: (1) [REDACTED] (and any other accounts at [REDACTED] and any other accounts at [REDACTED]) (3) any of Ms. Maxwell's email account associated with The Terramar Project (including any account [REDACTED]); and (4) any other email accounts either used in the past, or currently in use.

Additionally, please use FileSeek software (or a functional equivalent) to retrieve any data, including electronic documents (such as Word documents; PDFs; Excel sheets; etc.), from Ms. Maxwell's devices, including personal computers, work computers, any tablets, and any phones. This includes any cloud storage accounts. Please confirm that you have imaged Ms. Maxwell's hard drives and other devices.

Once you have gathered that data onto a platform (such as Summation or its functional equivalent), please run the below search terms. Since the Court ordered us to negotiate the search terms, please let me know if you think additional terms would be appropriate or whether you object to any terms, and your basis thereof.

When applying the search terms, the search terms need to "hit" on documents even if the terms are embedded within other words. So, for example, the term "acuity" would yield a hit on the document, even if the word in the document is "acuityreputatoin." To return a hit on those

Laura A. Menninger, Esq.
June 30, 2016
Page 2 of 12

embedded terms, I request that you use “wildcards” to ensure that embedded terms are located. (Wildcard characters are used to expand word searches into pattern searches by “replacing” single or multiple characters.) Where there are a specific number of characters needed to be included, a single wildcard will achieve that purpose. For example, in some programs, ! is used for single character wildcards, and * is used for multiple character wildcards. For instance:

- (a) Single character wildcard example: a search for **L!n!** will return “long,” “link,” “lane,” “lone,” etc.
- (b) Multiple character wildcard example: a search for **chil*** will return “children,” “chill,” “chilling,” etc.
- (c) Mixed use of wildcards: a search for **L!n*** will return “lines,” “lining,” “linty,” etc.

Accordingly, the below search terms are submitted with wildcard characters to be applied in the manner of the examples above. Please apply them as such with whatever characters is required by the software/platform that you will be using.

Similarly, regarding how the terms are combined (**AND** or **OR**). **OR** should expand your results while **AND** will restrict result to only those which include all the terms.

Additionally, I want to clarify that I would like all of the metadata to be searched in addition to the text of the documents. For example, if the search term is “acuity,” “hits” should include all the document that include the word “acuity” in their text OR in their metadata (this includes words in items such as email subjects, filenames, as well as any documents which include that word somewhere within their text).

I also wanted to point out another special syntax with regard to proximity searching. This is a search that finds words within a specified distance from one another. On some software, this is represented as w/#, so a search for “**meet w/2 greet**” will return “meet and greet,” “greet and meet” and “meet and nicely greet.” Please apply accordingly.

Additionally, for searches for people’s initials in the search terms, please use “exact matches,” “stand alone,” or “literal” terms (see, e.g., PA, AD, JE, GM).

Finally, the search terms are **not** to be treated as case-sensitive, meaning that the terms should be searched according to their letters, regardless of whether they are represented in the list as containing upper case or lower case letters.



The following are the applicable search terms.

- 1) jef*
- 2) geof*


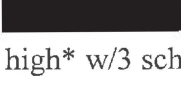
Laura A. Menninger, Esq.
June 30, 2016
Page 3 of 12

- 3) epst!!n*
- 4) jeevacation*
- 5) j* w/2 *jep*
- 6) j* w/2 *jeep*
- 7) roberts*
- 8) g!!ff!!*
- 9) virginia*
- 10) jenna*
- 11) jena*
- 12) genna*
- 13) andrew*
- 14) prince*
- 15) royal*
- 16) PA
- 17) JE
- 18) GM
- 19) AD
- 20) AH
- 21) GX
- 22) massage*
- 23) masseur*
- 24) therapist*
- 25) ellmax*
- 26) mindspring*
- 27) gmax*
- 28) emmy*
- 29) taylor*
- 30) sara*
- 31) kellen*
- 32) kensington*
- 33) vikers*
- 34) dubin*
- 35) eva*
- 36) glen*
- 37) brunel*
- 38) jean*
- 39) luc*
- 40) nadia*



Laura A. Menninger, Esq.
June 30, 2016
Page 4 of 12

- 41) marcinko*
- 42) *copter*
- 43) chopper*
- 44) pilot*
- 45) manifest*
- 46) log*
- 47) flight*
- 48) passport*
- 49) terramar*
- 50) southern* w/3 district*
- 51) palm* w/3 beach*
- 52) state* /3 attorney*
- 53) ross*
- 54) gow*
- 55) acuity*
- 56) victoria* w/3 secret*
- 57) all!n*
- 58) all!n*
- 59) dersh*
- 60) law.harvard.edu*
- 61) alandersh*
- 62) 
- 63) 
- 64) new* w/3 mexico*
- 65) NM
- 66) virgin* w/3 island*
- 67) usvi*
- 68) little* w/3 st*
- 69) little* w/3 saint*
- 70) st* w/3 j*
- 71) saint* w/3 j*
- 72) lsj*
- 73) lago*
- 74) clinton*
- 75) BC
- 76) HC
- 77) HRC
- 78) police*

Laura A. Menninger, Esq.
June 30, 2016
Page 5 of 12

- 79) cop*
- 80) fbi*
- 81) federal* w/3 bur*
- 82) bur* w/8 inves! *
- 83) sex*
- 84) abuse*
- 85) toy*
- 86) dildo*
- 87) strap* w/3 on*
- 88) vibr*
- 89) sm* w/3 101*
- 90) slave*
- 91) erotic*
- 92) servitude*
- 93) 
- 94) 
- 95) high* w/3 school*
- 96) secondary* w/3 school*
- 97) campus*
- 98) duke*
- 99) york*
- 100) licen!e*
- 101) assault*
- 102) juvenile*
- 103) seal*
- 104) joint* w/3 defen*
- 105) jda
- 106) roadhouse*
- 107) grill*
- 108) illegal*
- 109) immune*
- 110) prosecut*
- 111) law* w/3 enforc*
- 112) jane* w/3 *doe*
- 113) hospital*
- 114) hotel*
- 115) suite*
- 116) villa*

Laura A. Menninger, Esq.
June 30, 2016
Page 6 of 12

- 117) model*
- 118) actress*
- 119) france*
- 120) paris*
- 121) zoro*
- 122) ranch*
- 123) vanity* w/ 3 fair*
- 124) alexander*
- 125) kathy*
- 126) miles*
- 127) james*
- 128) austrich*
- 129) phil*
- 130) barden*
- 131) bjorlin*
- 132) fary*
- 133) boothe*
- 134) laura*
- 135) evelyn*
- 136) boulet*
- 137) boylan*
- 138) bec*
- 139) bunner*
- 140) casey*
- 141) carolyn*
- 142) carolin*
- 143) paul*
- 144) cassell*
- 145) sharon*
- 146) churcher*
- 147) cousteau*
- 148) alexandar*
- 149) devansan*
- 150) 
- 151) 
- 152) edwards*
- 153) amanda*
- 154) ellison*

Laura A. Menninger, Esq.
June 30, 2016
Page 7 of 12


- 155) cimberly*
- 156) espinosa*
- 157) Tatiana*
- 158) farmer*
- 159) maria*
- 160) nn*
- 161) fekkai*
- 162) crystal*
- 163) figueroa*
- 164) anthony*
- 165) tony*
- 166) freeh*
- 167) louis*
- 168) dore*
- 169) gany*
- 170) garvin*
- 171) meg*
- 172) sheridan*
- 173) gibson*
- 174) but!e*
- 175) graff*
- 176) fred*
- 177) phil*
- 178) guderyon*
- 179) hall*
- 180) AH
- 181) harrison*
- 182) shannon*
- 183) victoria*
- 184) hazel*
- 185) brittany*
- 186) henderson*
- 187) jaffe*
- 188) carol*
- 189) kess*
- 190) kutikoff*
- 191) pete*
- 192) listerman*

Laura A. Menninger, Esq.
June 30, 2016
Page 8 of 12

- 193) lyons*
- 194) bob*
- 195) meister*
- 196) jamie*
- 197) melanson*
- 198) lyn! * w/100 miller*
- 199) marvin*
- 200) minsky*
- 201) 
- 202) 
- 203) 
- 204) mullen*
- 205) pagano*
- 206) mary*
- 207) paluga*
- 208) stan*
- 209) pottinger*
- 210) recarey*
- 211) reiter*
- 212) richards*
- 213) sky*
- 214) rothstein*
- 215) forest*
- 216) sawyer*
- 217) doug*
- 218) schoettle*
- 219) cecelia*
- 220) stein*
- 221) mark*
- 222) tafoya*
- 223) brent*
- 224) tindall*
- 225) kevin*
- 226) kim*
- 227) thompson*
- 228) tuttle*
- 229) vaghan*
- 230) cresenda*


Laura A. Menninger, Esq.
June 30, 2016
Page 9 of 12

- 231) valdes*
- 232) valla*
- 233) martiza*
- 234) vazquez*
- 235) vick*
- 236) ard*
- 237) jarr!d*
- 238) weisfeld*
- 239) courtn!y* w/5 wild*
- 240) alessi*
- 241) rizzo*
- 242) rinaldo*
- 243) biddle*
- 244) sophie*
- 245) sofie*
- 246) degeo*
- 247) anouska*



- 
- 249) fontanilla*
 - 250) lynn*
 - 251) jo* w/3 jo*
 - 252) gramza*
 - 253) grant*
 - 254) waitt*
 - 255) ted*
 - 256) theod*

- 
- 260) kovylina*

- 
- 263) lang*


- 
- 265) listerman*
 - 266) lopez*
 - 267) cindy*
 - 268) lutz*

Laura A. Menninger, Esq.
June 30, 2016
Page 10 of 12

269) mellawa*
270) brah*
271) iay*
272) 
273) 
274) mitrovich*
275) andrea*
276) peadon*
277) bill*
278) francis*
279) preece*
280) dara*
281) louella*
282) rabuyo*
283) robson*
284) haley*
285) adriana*
286) mucinska*
287) spamm*
288) visosky*
289) doug* OR dan* w/100 wilson*
290) igor*
291) zinoview*
292) allyson*
293) alyson*
294) alison*
295) allison*
296) chambers*
297) Gwendolyn*
298) beck*
299) Kelly*
300) Kelley*
301) Bovino*
302) ron*
303) burkle*
304) max*
305) cordero*
306) vald*

Laura A. Menninger, Esq.
June 30, 2016
Page 11 of 12

307) cotrin*
308) chauntae*
309) dav*
310) teala*
311) ry!n*
312) dionne*
313) anders!n*
314) Rosalie*
315) fr!!dman*
316) tiffany*
317) Kathryn*
318) eric*
319) erik*
320) Lesl*
321) groff*
322) clair*


325) gina*
326) ignatieva*
327) bret*
328) adam*
329) perry*
330) liffman*
331) Michael*
332) mike*
333) cheri*
334) lynch*
335) todd*
336) tom*
337) Pritzker*
338) Joanna*
339) sjoberg*
340) leslie*
341) wexner*
342) underage*
343) under!age*
344) minor*

Laura A. Menninger, Esq.
June 30, 2016
Page 12 of 12

- 345) daily* w/10 mail*
- 346) daily* w/10 news*
- 347) lie*
- 348) obvious* w/10 lie*
- 349) sex w/3 toy*
- 350) nipple*
- 351) schoolgirl
- 352) school w/3 girl
- 353) us w/3 att*
- 354) United w/3 states w/3 att*
- 355) Guggenheim
- 356) Pedophil*
- 357) Paedophil*
- 358) Gerbil*
- 359) Traffic*
- 360) Bed*
- 361) Bath*
- 362) Masturbate*
- 363) Ejaculate*
- 364) Masseur*
- 365) Lingerie
- 366) Boies*
- 367) Mccawley*
- 368) Schultz*

Sincerely,

A handwritten signature in blue ink that reads "Meredith L. Schultz". The signature is written in a cursive, flowing style.

Meredith L. Schultz

MLS:dk

EXHIBIT B

From: Laura Menninger
Sent: Thursday, July 14, 2016 2:35 PM
To: Meredith Schultz
Cc: Jeff Pagliuca; Sigrid S. McCawley - Boies, Schiller & Flexner LLP (smccawley@bsflp.com); 'brad@pathtojustice.com' (brad@pathtojustice.com)
Subject: Giuffre - Conferral regarding search terms

Meredith –

I am writing to you, in compliance with the Court's Order, to negotiate the search terms for the search of our client's electronic devices. While Jeff raised many of these issues orally with Brad last week, I am including them in written form so that there can be no dispute about our position.

I do object to the vast number of your 368 search terms. Most are not tied to any Request for Production served on Ms. Maxwell, nor the Court's Orders limiting those requests.

Terramar –

Search term 49 is "Terramar." While we are searching our client's terramar email address for otherwise responsive documents, this search term would pull up thousands of documents related to her work for that organization which are (a) non-responsive and (b) irrelevant to this action. We will not agree to this standalone search term.

Witness Names

With regard to the search terms numbered 124-341, insofar as I can tell, you have simply broken apart the first and last names of every witness included within your Rule 26 disclosures. However, you never submitted a RFP seeking all communications between our client and your witnesses. There are some RFPs which identify individual witnesses whose communications with our client you sought (e.g., 1 – Epstein, 2, -Plaintiff, 3-Prince Andrew ██████████ Kellen, Dubins, Brunel and Marcincova, 17-Gow, 37-Clintons) and I will include those names within our searches.

As to other names included on the list, many are incredibly common names (e.g., Bill, Mark, Phil, Pete, Bob, Mike, Todd) which you are asking to search as standalone terms, i.e., divorced from the accompanying surnames or first names. You have included the name "max*" well aware that our client's surname, and that of all of her paternal family members, will begin with those three letters together. Your search terms thus are likely to yield every single email sent or received by our client, or her family members, or any other document in her possession with her own name on the document or in the metadata, in other words hundreds of thousands of non-responsive documents. Your search terms include "bill" and thus are likely to include every bill that our client has received or sent or discussed. Your search terms include Philip Barden who the court has already ruled maintains an attorney-client relationship with our client (and to the extent others are copied on his emails, those would be captured by searches for the other people's names). You included my client's boyfriend of many years, though he is not on any witness list or in any RFP.

In sum, I will not agree to the search terms regarding witness names numbered 124-341 unless you (a) provide me with an actual RFP to which they each relate, and (b) make some effort to match them to actual people who have some relationship to this case (like first name /3 last name or some parts thereof).

Lawyer Names

What is your basis for search terms numbered 366-368: McCawley, Schultz and Boies? Likewise to the extent Mr. Edwards and Cassell are also included in the witness list, what is your basis for searching for documents referencing them? These search terms seemed designed to pull privileged attorney-client communications and do not correspond to any RFP. We will not agree to these terms.

Common Words

You have included a number of words that relate to common items and place names. Please explain which RFP allows for a search of the following terms:

- 50 – Southern District (which will pull up every attorney-client communication that refers to our case and includes any pleading)
- 51 – Palm Beach (a place our client lived for many years)
- 64 – New Mexico
- 66-72 – USVI by various names
- 113 – hospital
- 114 – 116 – hotel, suite, villa (every single travel record related to our client’s travel which the Court has not ordered)
- 119 – 120 – Paris, France
- 121 – 122 – Zoro, Ranch
- 360 – Bed
- 361 – Bath
- 365 - Lingerie

Other Words

Many other words have no relationship to this case. Please advise me as to (a) which RFP they correspond to and (b) your good faith basis for seeking these search terms in relation to any such RFP:

- 93 – Abernathy
- 94 – Brillo
- 355 – Guggenheim
- 358 - Gerbil

Conferral

Although many of your other search terms are a tremendous stretch, I can agree to them in the interest of getting the search done on a timely basis. According to our forensic expert, running a search on Ms. Maxwell’s devices of all 368 terms will take more than a week. I am available by telephone today and tomorrow to discuss the issues raised herein. If I do not hear from you, I will presume that you are in agreement to the remainder of the terms being run on the devices. That should allow a production of documents in time for Ms. Maxwell’s continued deposition next week.

I am intentionally not taking a position regarding the other demands you provided in your letter of June 30 at pages 1-2. The searches will be conducted in accordance with standard practices in the industry and the Court ordered us to negotiate search terms only.

-Laura



Laura A. Menninger
Haddon, Morgan and Foreman, P.C.
150 East 10th Avenue
Denver, Colorado 80203
Main 303.831.7364 FX 303.832.2628
lmenninger@hmflaw.com
www.hmflaw.com

CONFIDENTIALITY NOTICE: This e-mail transmission, and any documents, files or previous e-mail messages attached to it may contain information that is confidential or legally privileged. If you are not the intended

recipient, or a person responsible for delivering it to the intended recipient, you are hereby notified that you must not read this transmission and that any disclosure, copying, printing, distribution or use of any of the information contained in or attached to this transmission is STRICTLY PROHIBITED. If you have received this transmission in error, please notify the sender by telephone or return e-mail and delete the original transmission and its attachments without reading or saving it in any manner. Thank you.

EXHIBIT C

From: Laura Menninger
Sent: Monday, July 18, 2016 2:27 PM
To: 'Meredith Schultz'
Cc: Jeff Pagliuca; 'Sigrid S. McCawley - Boies, Schiller & Flexner LLP (smccawley@bsfllp.com)'; 'brad@pathtojustice.com' (brad@pathtojustice.com)
Subject: RE: Giuffre - Conferral regarding search terms

Dear Meredith,

I am in receipt of your opposition to the Letter Motion to Strike your Motion for an Adverse Inference. The representations in the Response are perplexing, particularly in light of the below email communication in which I specifically 1) informed you of the search terms that we would run derived from your list, and 2) specifically requested a telephone conference on the issue of search terms pursuant to the Court's Order and prior to any such search.

Your representation to the Court that we are running "secret search terms unilaterally chosen by Defendant" is simply inaccurate. As clearly set forth in the below email communication, in order to move production forward, we invited discussion regarding our plan to run a subset of the search terms that *you* selected. The items excluded from the search were those terms you proposed that were unattached to any discovery request, or would result in the selection irrelevant documents due to the commonality of the term or their irrelevance to this case, such as TerraMar. The terms run are not "secret" and not selected by the defense – they are "the remainder of the terms" not specifically discussed in the below email. For avoidance of doubt, it is your proposed list, *excluding* items 49, 50, 51, 64, 66-72, 93-94, 113, 114-116, 119-120, 121-122, 124-341, 355, 358, 360, 361, and 365, 366-368.

Second, and again contrary to the representation in your Response, I specifically requested a time for a telephone conferral to discuss the search terms. Specifically, I stated "***I am available by telephone today and tomorrow to discuss the issues raised herein.***" Despite this clear request for a call if there were issues you wished to discuss, or if you had specific RFP's to which the excluded terms related, I heard nothing from you on Thursday afternoon or Friday to set a time to discuss the terms or the issues raised regarding overbreadth. As such, we proceeded processing your list with the exceptions set forth.

I will reiterate my offer to set a call to discuss the excluded terms to determine if there are agreeable additions. In light of the deposition scheduled for Friday and the time it takes to run searches, any call would need to be set prior to noon MT tomorrow. Please advise, one way or the other, if you are satisfied with the list or if you would like to set a call.

-Laura



Laura A. Menninger
Haddon, Morgan and Foreman, P.C.
150 East 10th Avenue
Denver, Colorado 80203
Main 303.831.7364 FX 303.832.2628
lmessenger@hmflaw.com
www.hmflaw.com

CONFIDENTIALITY NOTICE: This e-mail transmission, and any documents, files or previous e-mail messages attached to it may contain information that is confidential or legally privileged. If you are not the intended

recipient, or a person responsible for delivering it to the intended recipient, you are hereby notified that you must not read this transmission and that any disclosure, copying, printing, distribution or use of any of the information contained in or attached to this transmission is STRICTLY PROHIBITED. If you have received this transmission in error, please notify the sender by telephone or return e-mail and delete the original transmission and its attachments without reading or saving it in any manner. Thank you.

From: Laura Menninger
Sent: Thursday, July 14, 2016 2:35 PM
To: Meredith Schultz
Cc: Jeff Pagliuca; Sigrid S. McCawley - Boies, Schiller & Flexner LLP (smccawley@bsfllp.com); 'brad@pathtojustice.com' (brad@pathtojustice.com)
Subject: Giuffre - Conferral regarding search terms

Meredith –

I am writing to you, in compliance with the Court's Order, to negotiate the search terms for the search of our client's electronic devices. While Jeff raised many of these issues orally with Brad last week, I am including them in written form so that there can be no dispute about our position.

I do object to the vast number of your 368 search terms. Most are not tied to any Request for Production served on Ms. Maxwell, nor the Court's Orders limiting those requests.

Terramar –

Search term 49 is "Terramar." While we are searching our client's terramar email address for otherwise responsive documents, this search term would pull up thousands of documents related to her work for that organization which are (a) non-responsive and (b) irrelevant to this action. We will not agree to this standalone search term.

Witness Names

With regard to the search terms numbered 124-341, insofar as I can tell, you have simply broken apart the first and last names of every witness included within your Rule 26 disclosures. However, you never submitted a RFP seeking all communications between our client and your witnesses. There are some RFPs which identify individual witnesses whose communications with our client you sought (e.g., 1 – Epstein, 2, -Plaintiff, 3-Prince Andrew [REDACTED] Kellen, Dubins, Brunel and Marcincova, 17-Gow, 37-Clintons) and I will include those names within our searches.

As to other names included on the list, many are incredibly common names (e.g., Bill, Mark, Phil, Pete, Bob, Mike, Todd) which you are asking to search as standalone terms, i.e., divorced from the accompanying surnames or first names. You have included the name "max*" well aware that our client's surname, and that of all of her paternal family members, will begin with those three letters together. Your search terms thus are likely to yield every single email sent or received by our client, or her family members, or any other document in her possession with her own name on the document or in the metadata, in other words hundreds of thousands of non-responsive documents. Your search terms include "bill" and thus are likely to include every bill that our client has received or sent or discussed. Your search terms include Philip Barden who the court has already ruled maintains an attorney-client relationship with our client (and to the extent others are copied on his emails, those would be captured by searches for the other people's names). You included my client's boyfriend of many years, though he is not on any witness list or in any RFP.

In sum, I will not agree to the search terms regarding witness names numbered 124-341 unless you (a) provide me with an actual RFP to which they each relate, and (b) make some effort to match them to actual people who have some relationship to this case (like first name /3 last name or some parts thereof).

Lawyer Names

What is your basis for search terms numbered 366-368: McCawley, Schultz and Boies? Likewise to the extent Mr. Edwards and Cassell are also included in the witness list, what is your basis for searching for documents referencing them? These search terms seemed designed to pull privileged attorney-client communications and do not correspond to any RFP. We will not agree to these terms.

Common Words

You have included a number of words that relate to common items and place names. Please explain which RFP allows for a search of the following terms:

- 50 – Southern District (which will pull up every attorney-client communication that refers to our case and includes any pleading)
- 51 – Palm Beach (a place our client lived for many years)
- 64 – New Mexico
- 66-72 – USVI by various names
- 113 – hospital
- 114 – 116 – hotel, suite, villa (every single travel record related to our client’s travel which the Court has not ordered)
- 119 – 120 – Paris, France
- 121 – 122 – Zoro, Ranch
- 360 – Bed
- 361 – Bath
- 365 - Lingerie

Other Words

Many other words have no relationship to this case. Please advise me as to (a) which RFP they correspond to and (b) your good faith basis for seeking these search terms in relation to any such RFP:

- 93 – Abernathy
- 94 – Brillo
- 355 – Guggenheim
- 358 - Gerbil

Conferral

Although many of your other search terms are a tremendous stretch, I can agree to them in the interest of getting the search done on a timely basis. According to our forensic expert, running a search on Ms. Maxwell’s devices of all 368 terms will take more than a week. I am available by telephone today and tomorrow to discuss the issues raised herein. If I do not hear from you, I will presume that you are in agreement to the remainder of the terms being run on the devices. That should allow a production of documents in time for Ms. Maxwell’s continued deposition next week.

I am intentionally not taking a position regarding the other demands you provided in your letter of June 30 at pages 1-2. The searches will be conducted in accordance with standard practices in the industry and the Court ordered us to negotiate search terms only.

-Laura



Laura A. Menninger
Haddon, Morgan and Foreman, P.C.
150 East 10th Avenue
Denver, Colorado 80203
Main 303.831.7364 FX 303.832.2628
lmenninger@hmflaw.com

www.hmflaw.com

CONFIDENTIALITY NOTICE: This e-mail transmission, and any documents, files or previous e-mail messages attached to it may contain information that is confidential or legally privileged. If you are not the intended recipient, or a person responsible for delivering it to the intended recipient, you are hereby notified that you must not read this transmission and that any disclosure, copying, printing, distribution or use of any of the information contained in or attached to this transmission is STRICTLY PROHIBITED. If you have received this transmission in error, please notify the sender by telephone or return e-mail and delete the original transmission and its attachments without reading or saving it in any manner. Thank you.

EXHIBIT D

From: Laura Menninger
Sent: Tuesday, July 19, 2016 11:33 AM
To: 'Meredith Schultz'
Subject: RE: Giuffre - Conferral regarding search terms

Meredith:

I write to confirm our oral conferral. Please let me know if you disagree with the following or if there is some other agreement you think we reached:

1. I will endeavor to have my client gain access to an earthlink account that you believe is hers. Your basis for that belief is a disk you produced last week, obtained pursuant to a FOIA request, that contained at Page 2035 an address book from approximately 2005 which has that earthlink account name next to Ms. Maxwell's name.
2. Terramar – You have withdrawn that as a standalone search term. I have represented to you that we have searched all Terramar emails for otherwise responsive documents as well as [REDACTED]
3. Witness names – You believe that search terms 124-341, which are witness names broken up into first and last names from your Rule 26 list, relate to your RFP number 5 (“All documents relating to massages...”). I represented to you that I have searched for the terms “massage,” “masseur,” “therapy” etc. as you requested, but you would still like me to search a subset of 124-341 surnames names for all communications with certain witnesses that you believe relate to “massages.” I said I would look at your list, when you send it, and evaluate whether we still object to running those more limited names to see if there are any communications that “relate to massages.” I still object that the search terms involving names is too broad and burdensome for me to have to review all communications with those individuals to try to discern what you believe may or may not relate to a “massage.”
4. Lawyer names – You have withdrawn.
5. Common words – You have withdrawn with the exception of “lingerie,” which I will run to see if it relates in some way to RFP 5 (“massages”).
6. Other words –
 - a. You have withdrawn #93 Abernathy and #94 Brillo.
 - b. I maintain my objection to Guggenheim, the name of a museum which you represented to me pertains in some way to allegations made by witnesses Farmer, but for which no documents or other information has been shared (i.e., I have never seen any allegations by witnesses Farmer). Because there is no RFP to which I believe that term relates, and it is the name of a museum, I object to running that search term.
 - c. Gerbil – You have withdrawn.
7. Additionally:
 - a. I advised you that I was not able to search for # [REDACTED] because those letters are the first part of my client's longstanding email address, and search for that term will yield literally every single email she has sent or received. I believe you have withdrawn that requested search term.
 - b. I advised you that I was not able to search for initials at #16-21 and 75-77. To the extent those initials represent people from whom you have requested all communications (and which the Court has limited to 1999-2002 and post-2002 as they relate to sex trafficking), for example, Jeffrey Epstein, Prince Andrew, I am searching for and producing responsive documents, so there is no need to search for the

initials. With regards to [REDACTED], you told me that is "[REDACTED]" and there is no standalone request for communications with her.

-Laura



Laura A. Menninger
Haddon, Morgan and Foreman, P.C.
150 East 10th Avenue
Denver, Colorado 80203
Main 303.831.7364 FX 303.832.2628
lmenninger@hmflaw.com
www.hmflaw.com

CONFIDENTIALITY NOTICE: This e-mail transmission, and any documents, files or previous e-mail messages attached to it may contain information that is confidential or legally privileged. If you are not the intended recipient, or a person responsible for delivering it to the intended recipient, you are hereby notified that you must not read this transmission and that any disclosure, copying, printing, distribution or use of any of the information contained in or attached to this transmission is STRICTLY PROHIBITED. If you have received this transmission in error, please notify the sender by telephone or return e-mail and delete the original transmission and its attachments without reading or saving it in any manner. Thank you.

From: Laura Menninger
Sent: Monday, July 18, 2016 2:27 PM
To: 'Meredith Schultz'
Cc: Jeff Pagliuca; 'Sigrid S. McCawley - Boies, Schiller & Flexner LLP (smccawley@bsflp.com)'; 'brad@pathtojustice.com' (brad@pathtojustice.com)
Subject: RE: Giuffre - Conferral regarding search terms

Dear Meredith,

I am in receipt of your opposition to the Letter Motion to Strike your Motion for an Adverse Inference. The representations in the Response are perplexing, particularly in light of the below email communication in which I specifically 1) informed you of the search terms that we would run derived from your list, and 2) specifically requested a telephone conference on the issue of search terms pursuant to the Court's Order and prior to any such search.

Your representation to the Court that we are running "secret search terms unilaterally chosen by Defendant" is simply inaccurate. As clearly set forth in the below email communication, in order to move production forward, we invited discussion regarding our plan to run a subset of the search terms that *you* selected. The items excluded from the search were those terms you proposed that were unattached to any discovery request, or would result in the selection irrelevant documents due to the commonality of the term or their irrelevance to this case, such as TerraMar. The terms run are not "secret" and not selected by the defense – they are "the remainder of the terms" not specifically discussed in the below email. For avoidance of doubt, it is your proposed list, *excluding* items 49, 50, 51, 64, 66-72, 93-94, 113, 114-116, 119-120, 121-122, 124-341, 355, 358, 360, 361, and 365, 366-368.

Second, and again contrary to the representation in your Response, I specifically requested a time for a telephone conferral to discuss the search terms. Specifically, I stated "***I am available by telephone today and tomorrow to discuss the issues raised herein.***" Despite this clear request for a call if there were issues you wished to discuss, or if you had specific RFP's to which the excluded terms related, I heard nothing from you on Thursday afternoon or Friday to set a

time to discuss the terms or the issues raised regarding overbreadth. As such, we proceeded processing your list with the exceptions set forth.

I will reiterate my offer to set a call to discuss the excluded terms to determine if there are agreeable additions. In light of the deposition scheduled for Friday and the time it takes to run searches, any call would need to be set prior to noon MT tomorrow. Please advise, one way or the other, if you are satisfied with the list or if you would like to set a call.

-Laura



Laura A. Menninger
Haddon, Morgan and Foreman, P.C.
150 East 10th Avenue
Denver, Colorado 80203
Main 303.831.7364 FX 303.832.2628
lmessenger@hmflaw.com
www.hmflaw.com

CONFIDENTIALITY NOTICE: This e-mail transmission, and any documents, files or previous e-mail messages attached to it may contain information that is confidential or legally privileged. If you are not the intended recipient, or a person responsible for delivering it to the intended recipient, you are hereby notified that you must not read this transmission and that any disclosure, copying, printing, distribution or use of any of the information contained in or attached to this transmission is STRICTLY PROHIBITED. If you have received this transmission in error, please notify the sender by telephone or return e-mail and delete the original transmission and its attachments without reading or saving it in any manner. Thank you.

From: Laura Menninger
Sent: Thursday, July 14, 2016 2:35 PM
To: Meredith Schultz
Cc: Jeff Pagliuca; Sigrid S. McCawley - Boies, Schiller & Flexner LLP (smccawley@bsflp.com); 'brad@pathtojustice.com' (brad@pathtojustice.com)
Subject: Giuffre - Conferral regarding search terms

Meredith –

I am writing to you, in compliance with the Court's Order, to negotiate the search terms for the search of our client's electronic devices. While Jeff raised many of these issues orally with Brad last week, I am including them in written form so that there can be no dispute about our position.

I do object to the vast number of your 368 search terms. Most are not tied to any Request for Production served on Ms. Maxwell, nor the Court's Orders limiting those requests.

Terramar –

Search term 49 is "Terramar." While we are searching our client's terramar email address for otherwise responsive documents, this search term would pull up thousands of documents related to her work for that organization which are (a) non-responsive and (b) irrelevant to this action. We will not agree to this standalone search term.

Witness Names

With regard to the search terms numbered 124-341, insofar as I can tell, you have simply broken apart the first and last names of every witness included within your Rule 26 disclosures. However, you never submitted a RFP seeking all communications between our client and your witnesses. There are some RFPs which identify individual witnesses whose communications with our client you sought (e.g., 1 – Epstein, 2, -Plaintiff, 3-Prince Andrew [REDACTED] Kellen, Dubins, Brunel and Marcincova, 17-Gow, 37-Clintons) and I will include those names within our searches.

As to other names included on the list, many are incredibly common names (e.g., Bill, Mark, Phil, Pete, Bob, Mike, Todd) which you are asking to search as standalone terms, i.e., divorced from the accompanying surnames or first names. You have included the name “max*” well aware that our client’s surname, and that of all of her paternal family members, will begin with those three letters together. Your search terms thus are likely to yield every single email sent or received by our client, or her family members, or any other document in her possession with her own name on the document or in the metadata, in other words hundreds of thousands of non-responsive documents. Your search terms include “bill” and thus are likely to include every bill that our client has received or sent or discussed. Your search terms include Philip Barden who the court has already ruled maintains an attorney-client relationship with our client (and to the extent others are copied on his emails, those would be captured by searches for the other people’s names). You included my client’s boyfriend of many years, though he is not on any witness list or in any RFP.

In sum, I will not agree to the search terms regarding witness names numbered 124-341 unless you (a) provide me with an actual RFP to which they each relate, and (b) make some effort to match them to actual people who have some relationship to this case (like first name /3 last name or some parts thereof).

Lawyer Names

What is your basis for search terms numbered 366-368: McCawley, Schultz and Boies? Likewise to the extent Mr. Edwards and Cassell are also included in the witness list, what is your basis for searching for documents referencing them? These search terms seemed designed to pull privileged attorney-client communications and do not correspond to any RFP. We will not agree to these terms.

Common Words

You have included a number of words that relate to common items and place names. Please explain which RFP allows for a search of the following terms:

- 50 – Southern District (which will pull up every attorney-client communication that refers to our case and includes any pleading)
- 51 – Palm Beach (a place our client lived for many years)
- 64 – New Mexico
- 66-72 – USVI by various names
- 113 – hospital
- 114 – 116 – hotel, suite, villa (every single travel record related to our client’s travel which the Court has not ordered)
- 119 – 120 – Paris, France
- 121 – 122 – Zoro, Ranch
- 360 – Bed
- 361 – Bath
- 365 - Lingerie

Other Words

Many other words have no relationship to this case. Please advise me as to (a) which RFP they correspond to and (b) your good faith basis for seeking these search terms in relation to any such RFP:

- 93 – Abernathy
- 94 – Brillo
- 355 – Guggenheim
- 358 - Gerbil

Conferral

Although many of your other search terms are a tremendous stretch, I can agree to them in the interest of getting the search done on a timely basis. According to our forensic expert, running a search on Ms. Maxwell's devices of all 368 terms will take more than a week. I am available by telephone today and tomorrow to discuss the issues raised herein. If I do not hear from you, I will presume that you are in agreement to the remainder of the terms being run on the devices. That should allow a production of documents in time for Ms. Maxwell's continued deposition next week.

I am intentionally not taking a position regarding the other demands you provided in your letter of June 30 at pages 1-2. The searches will be conducted in accordance with standard practices in the industry and the Court ordered us to negotiate search terms only.

-Laura



Laura A. Menninger
Haddon, Morgan and Foreman, P.C.
150 East 10th Avenue
Denver, Colorado 80203
Main 303.831.7364 FX 303.832.2628
lmenninger@hmflaw.com
www.hmflaw.com

CONFIDENTIALITY NOTICE: This e-mail transmission, and any documents, files or previous e-mail messages attached to it may contain information that is confidential or legally privileged. If you are not the intended recipient, or a person responsible for delivering it to the intended recipient, you are hereby notified that you must not read this transmission and that any disclosure, copying, printing, distribution or use of any of the information contained in or attached to this transmission is STRICTLY PROHIBITED. If you have received this transmission in error, please notify the sender by telephone or return e-mail and delete the original transmission and its attachments without reading or saving it in any manner. Thank you.

EXHIBIT E

From: Meredith Schultz <mschultz@BSFLLP.com>
Sent: Wednesday, July 20, 2016 11:24 AM
To: Laura Menninger
Cc: Sigrid McCawley; Jeff Pagliuca; Brad Edwards; Paul Cassell (cassellp@law.utah.edu)
Subject: RE: Conferral regarding forensic search

Follow Up Flag: Follow Up
Flag Status: Flagged

Laura,

Please see my additions in-line, **in black**, below to your email sent yesterday. My in-line communication should also be responsive to the email that you just sent. If I have left anything out, please let me know.

Thanks,

Meredith

Meredith L. Schultz
BOIES, SCHILLER & FLEXNER LLP
401 East Las Olas Blvd., Suite 1200
Fort Lauderdale, FL 33301
Phone: 954-356-0011 ext. 4204
Fax: 954-356-0022
<http://www.bsflp.com>

From: Laura Menninger [<mailto:lmessenger@hmflaw.com>]
Sent: Tuesday, July 19, 2016 1:33 PM
To: Meredith Schultz
Subject: RE: Giuffre - Conferral regarding search terms

Meredith:

I write to confirm our oral conferral. Please let me know if you disagree with the following or if there is some other agreement you think we reached:

1. I will endeavor to have my client gain access to an earthlink account that you believe is hers. Your basis for that belief is a disk you produced last week, obtained pursuant to a FOIA request, that contained at Page 2035 an address book from approximately 2005 which has that earthlink account name next to Ms. Maxwell's name. Please advise of the processes you are undertaking to access the account, and the process you undertook to ascertain that the mindspring account no longer exists.
2. Terramar – You have withdrawn that as a standalone search term. I have represented to you that we have searched all Terramar emails for otherwise responsive documents as well as [REDACTED].
3. Witness names – You believe that search terms 124-341, which are witness names broken up into first and last names from your Rule 26 list, relate to your RFP number 5 (“All documents relating to massages...”). I represented to you that I have searched for the terms “massage,” “masseur,” “therapy” etc. as you requested,

but you would still like me to search a subset of 124-341 surnames names for all communications with certain witnesses that you believe relate to “massages.” I said I would look at your list, when you send it, and evaluate whether we still object to running those more limited names to see if there are any communications that “relate to massages.” I still object that the search terms involving names is too broad and burdensome for me to have to review all communications with those individuals to try to discern what you believe may or may not relate to a “massage.”

I disagree with your objection that reviewing (and producing relevant) documents containing these discrete surnames is too broad a request or overly burdensome, particularly, as you have not presented any numbers of documents associated with those names, since you have not yet run the terms. Should one of the names somehow yield thousands of documents, please let me know, and I’m certain we can come to an agreement to adjust the term so as to not yield an unmanageable result. As it is, I would expect these discrete surnames to yield a reasonable number of “hits,” as most are not common words (more on that below).

Per our conversation, there are a number of individuals who we have reason to believe were either:

- (1) victims of the “massages;”
- (2) witnesses the “massages” (including people who have knowledge of the “massages”); or
- (3) perpetrators of the “massages,” either by having a “massage” themselves, arranging for another to have a “massage,” or by arranging for a girl to give a “massage” (either directly or through another girl).

The following are surnames of the aforementioned individuals, all of which are taken from the parties’ Rule 26 disclosures. Individuals who possess the same last name will be represented once by the common name. Names enumerated in Plaintiff’s individual requests are absent from this list pursuant to your representation that those names have been run. The vast majority of the surnames are fairly uncommon (e.g., [REDACTED]), therefore, I assume from the outset that any “hits” they yield will relate to the individual, and be limited in number. For those surnames are more common, or have other meanings (e.g., [REDACTED]), I have noted the full name for ease of reference. For those names, please use a reasonable, good-faith syntax to capture communications with those individuals -- [REDACTED] Sometimes that takes some trial-and-error – I’m happy to be of any assistance with regard to that process. Please let me know what your syntax you ended up using for those terms.

- Alessi
- Biddle
- [REDACTED]
- Brunel
- [REDACTED]
- Casey (this is a sur-name to Caroly Casey)
- Chambers
- Cordero
- Cotrin
- Cousteau
- Davies
- DeGeorgieou
- Dionne
- Dubin
- [REDACTED]
- Espinoza
- Farmer
- Ward
- Fekkai

- Figueroa
- Fontanilla
- Friedman
- Gibson-Butte
- Gramza
- Gany
- Grant
- Groff
- [REDACTED]
- Hazel (surname of Claire Hazel)
- Harrison (surname of Shelley Harrison)
- Ignatieva
- [REDACTED]
- Kovyлина
- [REDACTED]
- Liffman
- Lopez (surname of Cindy Lopez)
- Lutz
- Lynch (surname of Cheri Lynch)
- Meister
- Mellawa
- Minsky
- Mitrovich
- [REDACTED]
- Mullen
- Pagano
- Paluga
- Peadon
- Pritzker
- Preece
- Rabuyo
- Rizzo
- Robson
- Ross (surname of Adriana)
- Mucinska (former surname of Adriana)
- Sjoberg
- Spamm
- Stein (surname of Cecilia)
- [REDACTED]
- Valdes (surname of Cresenda)
- Vazquez
- Valenzuela
- Visosky
- Wexner
- Wild (surname of Courtney)
- Zinoviev

4. Lawyer names – You have withdrawn.

5. Common words – You have withdrawn with the exception of “lingerie,” which I will run to see if it relates in some way to RFP 5 (“massages”).
6. Other words –
 - a. You have withdrawn #93 Abernathy and #94 Brillo.
 - b. I maintain my objection to Guggenheim, the name of a museum which you represented to me pertains in some way to allegations made by witnesses Farmer, but for which no documents or other information has been shared (i.e., I have never seen any allegations by witnesses Farmer). Because there is no RFP to which I believe that term relates, and it is the name of a museum, I object to running that search term.
 - c. Gerbil – You have withdrawn.
7. Additionally:
 - a. I advised you that I was not able to search for [REDACTED] because those letters are the first part of my client’s longstanding email address, and search for that term will yield literally every single email she has sent or received. I believe you have withdrawn that requested search term.
 - b. I advised you that I was not able to search for initials at #16-21 and 75-77. To the extent those initials represent people from whom you have requested all communications (and which the Court has limited to 1999-2002 and post-2002 as they relate to sex trafficking), for example, Jeffrey Epstein, Prince Andrew, I am searching for and producing responsive documents, so there is no need to search for the initials. With regards to [REDACTED], you told me that is “[REDACTED]” and there is no standalone request for communications with her.

-Laura

Additionally, please inform me what steps you have taken to ascertain that the [REDACTED] is no longer in existence. Similarly, please keep me informed of your steps to access the [REDACTED]. Please pursue all available avenues to access those accounts, as Ms. Giuffre did with regard to her email accounts.

Finally, Ms. Maxwell’s produced documents that indicate that she has an iPad, etc. Please confirm that you have imaged her iPad as well as her phone in order to obtain the data from both (text messages, etc.).

One last thing - it occurred to me that in our discussion of terms that were run/not run and to be run/and not to be run, I don’t believe we discussed the terms containing individuals’ email account addresses, specifically Mr. Epstein and Mr. Dershowitz. (If we did discuss that, apologies for my lack of memory). Please confirm that you have run the terms associated with their email addresses. Specifically, these were the terms:

- 1) jeevacation*
- 2) j* w/2 *jep*
- 3) j* w/2 *jeep*
- 4) dersh*
- 5) law.harvard.edu*
- 6) [alandersh](#)*

Please let me know if you have any questions. Please treat this email as confidential under the Protective Order as it contains the names of underage victims of sexual abuse.

Thank you,

Meredith

Meredith L. Schultz
BOIES, SCHILLER & FLEXNER LLP
401 East Las Olas Blvd., Suite 1200
Fort Lauderdale, FL 33301
Phone: 954-356-0011 ext. 4204
Fax: 954-356-0022
<http://www.bsflp.com>

From: Laura Menninger [mailto:lmessenger@hmflaw.com]
Sent: Wednesday, July 20, 2016 1:01 PM
To: Meredith Schultz
Cc: Sigrid McCawley; Jeff Pagliuca; Brad Edwards; Paul Cassell (cassellp@law.utah.edu)
Subject: Conferral regarding forensic search

Meredith –

Apart from (i) the list of witness names you believe might be associated with the term “massage” (“massage” and related terms that you requested have been searched), (ii) the word “lingerie”, and (iii) [REDACTED] we have completed the forensic copy, search, retrieval and review of all hits on our client’s devices and email accounts as directed by the Court based on agreed to search terms, including those agreed to in our conferral yesterday.

After review of more than 9,000 documents and files containing your search terms, the only documents located not previously produced are 6 *privileged* documents which we will add to our log. We also located a number of privileged communications between our client and myself following the onset of litigation in this case which will not be logged consistent with both parties' agreed to practice. As predicted, no responsive non-privileged documents resulted from the exercise.

I will keep you apprised of the results of the “lingerie” and status of ability to access the [REDACTED] account. If you want me to consider running additional witness names because you believe those people may relate to RFP 5 regarding “massages”, please forward those names to me and your basis.

-Laura

The information contained in this electronic message is confidential information intended only for the use of the named recipient(s) and may contain information that, among other protections, is the subject of attorney-client privilege, attorney work product or exempt from disclosure under applicable law. If the reader of this electronic message is not the named recipient, or the employee or agent responsible to deliver it to the named recipient, you are hereby notified that any dissemination, distribution, copying or other use of this communication is strictly prohibited and no privilege is waived. If you have received this communication in error, please immediately notify the sender by replying to this electronic message and then deleting this electronic message from your computer. [v.1]

EXHIBIT F

Search Terms Defendant Has Already Searched

From Plaintiff's June 30th proposed list:

(note: Plaintiff's numbers have been used)

- 1) jef*
- 2) geof*
- 3) epst! !n*
- 4) jeevacation*
- 5) j* w/2 *jep*
- 6) j* w/2 *jeep*
- 7) roberts*
- 8) g!!ff!!*
- 9) virginia*
- 10) jenna*
- 11) jena*
- 12) genna*
- 13) andrew*
- 14) prince*
- 15) royal*
- 22) massage*
- 23) masseur*
- 24) therapist*
- 26) mindspring*
- 28) emmy*
- 29) taylor*
- 30) sara*
- 31) kellen*
- 32) kensington *
- 33) vikers*
- 34) dubin*
- 35) eva*
- 36) glen*
- 37) brunel*
- 38) jean*
- 39) luc*
- 40) nadia*
- 41) marcinko*
- 42) *copter*
- 43) chopper*
- 44) pilot*
- 45) manifest*
- 46) log*
- 47) flight*
- 48) passport*
- 52) state* /3 attorney*
- 53) ross*
- 54) gow*
- 55) acuity*
- 56) victoria* w/3 secret*

- 57) al!n*
- 58) all!n*
- 59) dersh*
- 60) law.harvard.edu *
- 61) alandersh*
- ██████████
- ██████████
- 73) lago*
- 74) clinton*
- 75) BC
- 76) HC
- 77) HRC
- 78) police*
- 79) cop*
- 80) fbi*
- 81) federal* w/3 bur*
- 82) bur* w/8 inves! *
- 83) sex*
- 84) abuse*
- 85) toy*
- 86) dildo*
- 87) strap* w/3 on*
- 88) vibr*
- 89) sm* w/3 101 *
- 90) slave*
- 91) erotic*
- 92) servitude*
- 95) high* w/3 school*
- 96) secondary* w/3 school*
- 97) campus*
- 98) duke*
- 99) york*
- 100) licen!e*
- 101) assault*
- 102) juvenile*
- 103) seal*
- 104) joint* w/3 defen*
- 105) jda
- 106) roadhouse*
- 107) grill*
- 108) illegal*
- 109) immune*
- 110) prosecut*
- 111) law* w/3 enforc*
- 112) jane* w/3 *doe*
- 117) model*
- 118) actress*
- 123) vanity* w/ 3 fair*
- 342) underage*

- 343) under!age*
- 344) minor*
- 345) daily* w/10 mail*
- 346) daily* w/10 news*
- 347) lie*
- 348) obvious* w/10 lie*
- 349) sex w/3 toy*
- 350) nipple*
- 351) schoolgirl
- 352) school w/3 girl
- 353) us w/3 att*
- 354) United w/3 states w/3 att*
- 356) Pedophil*
- 357) Paedophil*
- 359) Traffic*
- 362) Masturbate*
- 363) Ejaculate*
- 364) Masseur*

From Plaintiff's July 20 proposed list

- Alessi
- Biddle
- [REDACTED]
- Brunel
- [REDACTED]
- Casey (this is a sur-name to Caroly Casey)
- Chambers
- Cordero
- Cotrin
- Cousteau
- Davies
- DeGeorgieou
- Dionne
- Dubin
- [REDACTED]
- Espinoza
- Farmer
- Ward
- Fekkai
- Figueroa
- Fontanilla
- Friedman
- Gibson-Butte
- Gramza
- Gany
- Grant
- Groff

- [REDACTED]
- Hazel (surname of Claire Hazel)
- Harrison (surname of Shelley Harrison)
- Ignatieva
- [REDACTED]
- Kovylna
- [REDACTED]
- [REDACTED]
- Liffman
- Lopez (surname of Cindy Lopez)
- Lutz
- Lynch (surname of Cheri Lynch)
- Meister
- Mellawa
- Minsky
- Mitrovich
- [REDACTED]
- Mullen
- Pagano
- Paluga
- Peadon
- Pritzker
- Preece
- Rabuyo
- Rizzo
- Robson
- Ross (surname of Adriana)
- Mucinska (former surname of Adriana)
- Sjoberg
- Spamm
- Stein (surname of Cecilia)
- Taylor
- Valdes (surname of Cresenda)
- Vazquez
- Valenzuela
- Visosky
- Wexner
- Wild (surname of Courtney)
- Zinoviev

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 SUPPLEMENT TO MOTION FOR ADVERSE INFERENCE
INSTRUCTION BASED ON NEW INFORMATION

Plaintiff Virginia Giuffre, by and through her undersigned counsel, hereby files this Supplement to her Motion for Adverse Inference Instruction Based on New Information. Eleven months into this case, and after the close of fact discovery, Defendant continues to refuse to abide by her most basic and fundamental discovery obligations. A summary of this ongoing and willful non-compliance, as well as a supplement to her motion for an adverse inference instruction based on new information, follows. Most notably, Defendant claims to have run search terms and reviewed over 10,000 documents, but, remarkably, claims that not a single document - **not one** - is relevant to this litigation, and therefore produced nothing with respect to the search.

I. FACTUAL BACKGROUND

On October 27, 2015, Ms. Giuffre submitted her first set of Requests for Production. Defendant failed to make a reasonable search or production of her documents, and Ms. Giuffre sought relief from the Court numerous times:

- Plaintiff's Response in Opposition to Defendant's Motion to Stay Discovery (DE 20) - Defendant's Motion to Stay - Denied (DE 28).
- Plaintiff's February 26, 2016 Letter Motion to Compel Defendant to Sit for Her Deposition (DE 63) - Granted (DE 106).
- Plaintiff's Motion to Compel Documents Subject to Improper Claim of Privilege (DE 33) - Granted in Part (DE 73).
- Plaintiff's Motion to Compel Documents Subject to Improper Objections (DE 35) - Granted in part (106).
- Plaintiff's Response in Opposition to Defendant's Motion for a Protective Order Regarding Defendant's Deposition (DE 70) - Defendant's Motion Denied (DE 106).
- Plaintiff's Motion for Forensic Examination (DE 96) - Granted in part (June 20, 2016 Sealed Order).
- Plaintiff's Motion to Compel Defendant to Answer Deposition Questions (DE 143) - Granted (June 20, 2016 Sealed Order).
- Plaintiff's Motion for Adverse Inference Instruction (DE 279) - Pending.
- Plaintiff's Motion to Enforce the Court's Order and Direct Defendant to Answer Deposition Questions (DE 315) - Pending.

On June 20, 2016, this Court Granted in Part Ms. Giuffre's Motion for Forensic Exam, and directed Defendant to capture her data and run mutually agreed-upon search terms. The Court also ordered Defendant to produce documents to Ms. Giuffre by July 11, 2016. (This part of the Court's Order is not under seal and can be found at DE 264-1). On June 30, 2016, and on July 8, 2016, counsel for Ms. Giuffre sent letters to Defendant following up on this Order and proposing search terms (attached as exhibits to DE 279). Defendant did not respond. The July 11, 2016, deadline passed without any production from Defendant.

On July 13, 2016, Ms. Giuffre moved for an adverse inference instruction (DE 279). Thereafter, the Court denied Defendant's motion to strike Ms. Giuffre's motion for an adverse inference instruction, directing the parties to submit search terms to the Court on August 1, 2016, advising that "[a] briefing schedule and the submission date will be set after search terms are determined." (DE 301).

Pursuant to this Court's July 22, 2016, on Monday, August 1, 2016, Ms. Giuffre filed the list of search terms that Ms. Giuffre believes should be run over Defendant's data. (DE 323).

II. DISCUSSION

At a minimum, the Court should direct Defendant to run the search terms in the list originally submitted by Ms. Giuffre. More broadly, the Court should grant Ms. Giuffre's request for an adverse inference based on the incurable prejudice she has suffered as a result of Defendant's failure to comply with her discovery obligations and this Court's June 20, 2016, Order.

A. Defendant's Refusal to Even Run Ms. Giuffre's Name as a Search Term.

Defendant has been recalcitrant in running even the most basic searches of electronic data. For example, in a letter sent on June 8, 2016, and in a meet and confer call on July 26, 2016, counsel for Ms. Giuffre asked Defendant to run Ms. Giuffre's name as a search term to find documents responsive to (for example) Ms. Giuffre's Request No. 12, which sought Defendant's documents relating to Ms. Giuffre. That request was refused in writing on Friday, July 29, 2016, at 7:02 p.m. (EST). *See* McCawley Decl. at Exhibit 1, July 29, 2016, 7:02 p.m., Letter from Ty Gee to Ms. Schultz (refusing to run Ms. Giuffre's name as a search term as part of effort to identify responsive documents). Specifically, Mr. Gee's letter said that such a search term was inappropriate because it was "guaranteed" to generate "thousands of hits":

In your June 8 letter, apparently acknowledging the overbreadth of the RFP, you suggest the defendant could respond by conducting an electronic search for plaintiff's various names—searching all documents in defendant's possession. Setting aside that this is not what the RFP asked for, that too would entail an extraordinary and unreasonable amount of time and money, since plaintiff's various names are guaranteed to have thousands of hits, and someone would have to review every hit to determine, e.g., whether the document previously was provided to you, whether the document is not subject to production because of privilege, or whether it was a false hit. What would be the purpose of such an enormous expenditure of time and money? You have not said, but it appears fairly obvious that this is fishing with a drift net. We decline your request to engage in this exercise.

Having represented that running Ms. Giuffre's that name was an "extraordinary and unreasonable" task "guaranteed to have thousands of hits, and someone would have to review every hit ..." (McCawley Decl. at Exhibit 1 at pg. 2 (emphasis added)), *a mere three days later*, on Monday, August 1, 2016, Defendant seemingly reversed her position, and represented to the Court that she had, in fact, run Ms. Giuffre's names as search terms. (DE 321-6). But, contrary to the previous claim that it would be enormously burdensome to sort through these "hits," Defendant now claimed that she had not found any responsive documents.

It is possible that Defendant changed her mind over the weekend and reversed course. And, it is possible that Defendant did run those recently-contested terms over the weekend. And, it is possible that Defendant, over the weekend, gathered a team of lawyers to review the "thousands of hits" yielded by those terms. And, it is possible that not a single one of Defendant's thousands of documents bearing Ms. Giuffre's name was relevant to this action. All these things are possible, but none is likely.

Either way, Defendant's refusal to even include Ms. Giuffre's name as a search term (either in reality or in the position she took on Friday) is evidence of Defendant's continued bad faith and complete avoidance of her discovery obligations. The case centers on Defendant's

defamatory statements made *about Ms. Giuffre*. Obviously, Ms. Giuffre has a compelling need to obtain Defendant's documents about her, and she has accordingly requested Defendant's communications concerning her. Defendant's documents concerning Ms. Giuffre are directly relevant to this action, particularly because Defendant has created multiple drafts of statements to the press defaming Ms. Giuffre.

Throughout the months of motion practice concerning these issues, and throughout all of the meet and confers, Defendant's counsel has *never* presented a case supporting the far-fetched position that documents in the possession of the Defendant, and containing explicit references to Ms. Giuffre, are irrelevant and not subject to discovery. Defendant's refusal to use Ms. Giuffre's name as a search term, in light of Ms. Giuffre's requests for production, and in light of the defamation claim in this case, is so unfounded and obstructionist that it constitutes a violation of this Court's Order, *whether or not* Defendant actually engaged in the "extraordinary and unreasonable" task of running the term over the weekend.

The refusal to run this term is particularly inappropriate in light of this Court's order directing the Defendant to run "mutually agreed" upon search terms. It is impossible for Ms. Giuffre's counsel to begin working with opposing counsel to craft appropriate search terms when they refuse to extend minimal cooperation - first by completely ignoring Ms. Giuffre's multiple attempts to negotiate terms, then by ignoring the deadline to produce documents, and then by refusal to run the most basic search term. The first term that should be run in this defamation action - the most fundamental term - is Ms. Giuffre's name. Defendant's refusal to run that term is palpably unreasonable.

Defendant's refusal to cooperate is even more egregious given Ms. Giuffre's extensive efforts to provide discovery to Defendant. Ms. Giuffre has complied with Defendant's overly-

broad discovery requests that sought documents concerning dozens of individuals, including Ms. Giuffre's close family members. To comply with these extraordinarily broad requests, Ms. Giuffre ran search terms constituting the names of all these individuals. For example, Ms. Giuffre has run the following names as search terms, including Defendant's name, over her data:

- Ghislaine (the defendant)
- Maxwell (the defendant)
- Jeffrey (Jeffrey Epstein)
- Epstein (Jeffrey Epstein)
- Sky Roberts (the name Ms. Giuffre's father and brother)
- Lynn, Roberts (the name of Ms. Giuffre's mother)

Indeed, to date Ms. Giuffre has produced 8,321 pages of documents in her possession.

Fact discovery has now closed. Ms. Giuffre has requested that Defendant negotiate search terms with her as far back as March 10, 2016. This Court ordered Defendant to run mutually agreed upon search terms and produce relevant documents. Yet Defendant has yet to make any document production pursuant to this Court's June 20, 2016, Order.

B. Defendant's Other Failures to Produce Documents

Defendant's ignoring the July 11, 2016, court-ordered deadline to produce documents pursuant to mutually agreed upon terms, and Defendant's recalcitrance in searching for documents related to Ms. Giuffre are not the only examples of Defendant's failure to make appropriate discovery. Defendant claims to have run a number of Ms. Giuffre's search terms, yet claims that such a search yielded no responsive documents, save the few added to Defendant's privilege log. Defendant did not provide any "hit" information to show which terms yielded results, or how many results they yielded. Defendant claims to have reviewed over 10,000

documents containing the search terms and remarkably states that none – not a single one of the documents are responsive or relevant to the issues in this matter. Defendant’s representation is simply implausible, as a review of Defendant’s interactions with several of the important players in this case makes clear.

i. Ross Gow

The Court will recall that Ross Gow is Defendant’s London-based press agent, who shares Defendant’s attorney, Philip Barden, and who was connected with Defendant’s statements about Ms. Giuffre in both 2011 and 2015. Defendant admitted that she used Mr. Gow in 2011 in relation to Ms. Giuffre’s claims:

Q. And then below there is an email from Philip Barden to you and cc’ing Ross Gow on January 11, 2015. Do you see that?

A. Uh-huh.

Q. It says, Dear Ghislaine, as you know I have been working behind the scenes and this article comes from that. It helps but doesn't answer the VR claims. I will get the criminal allegations out. This shows the MOS will print truth, not just a VR voice piece. We can only make the truth by making a statement. What did he mean when he said, I will get the criminal allegations out, what was he referring to?

A. I have no idea.

Maxwell Dep. Tr. at 405:13-406:7 (April 22, 2016) (McCawley Decl. at Exhibit 2).

Defendant has admitted that she again used Mr. Gow in 2015 to issue a statement relating to Ms. Giuffre:

Q. This is an email from you on January 10, 2015 to Philip Barden and Ross Gow. The statement you had before you earlier, that, if you can pull that in front of you, the one page press release that you gave. You might know from memory. Was the press release that you issued with the statement about Virginia issued in or around January 2, 2015?

A. As best as I can recollect.

Maxwell Dep. Tr. at 361:4-13 (April 22, 2016) (McCawley Decl. at Exhibit 2).

Indeed, Defendant retained counsel to further assist Mr. Gow:

Q. Did you authorize Ross Gow to issue that statement on your behalf in January of 2015?

A. I already testified that that was done by my lawyers.

Maxwell Dep. Tr. at 273:6-10 (April 22, 2016) (McCawley Decl. at Exhibit 2).

In both years, 2011 and 2015, Defendant communicated with her counsel, communicated with her public relations agent, and caused a statement regarding Ms. Giuffre to be released publically, whereupon it was disseminated abroad. Yet, Defendant claims that she has no communications related to Ms. Giuffre beyond the handful of communications this Court ordered her to produce after the Court's *in camera* review. (DE 73).

ii. Eva Dubin

Defendant also appears to be claiming that she had not had even a single communications with Eva Dubin, Defendant's long-time friend whose husband was implicated in sexual abuse by Ms. Giuffre's deposition testimony. Defendant admitted that she is friends with Eva Dubin and admitted to visiting her home from time to time.

Q. Is Eva Dubin one of your friends?

A. Yes.

Maxwell Dep. Tr. at 57:22-23 (April 22, 2016) (McCawley Decl. at Exhibit 2).

Q. You remember from time to time being at the Dubin residence, correct?

A. I do.

Maxwell Dep. Tr. at 163:6-8 (July 22, 2016) (McCawley Decl. at Exhibit 3).

The Dubins are closely connected to this case. Indeed, Rinaldo Rizzo, the Dubins' butler, was in tears as he recounted Defendant bringing a fifteen-year-old girl to Eva Dubin's home. The girl, in utmost distress, told Mr. Rizzo that Defendant had stolen her passport and tried to make her have sex with Epstein on his private island, and then threatened her. Rizzo Dep. Tr. at

52:8-57:23 (June 10, 2016) (McCawley Decl. at Exhibit 4). Ms. Giuffre has also implicated Eva Dubin's husband, Glen Dubin, as someone who was involved in Defendant and Epstein's sex trafficking ring. And yet, Defendant would have the Court believe that Defendant and her friend never communicated about Ms. Giuffre's testimony. There are no emails; no text messages produced.

iii. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q. Do you remember speaking with a female by the name of [REDACTED]?

A. Yes.

Q. And is that -- did you learn from [REDACTED] about [REDACTED]?

THE WITNESS: That's correct.

Q. And what did you understand [REDACTED] interaction with Jeffrey Epstein to be?

THE WITNESS: [REDACTED] was allegedly dating Jeffrey Epstein at the time. And [REDACTED]s and [REDACTED] were roommates. During that time, [REDACTED] had met with [REDACTED] and went shopping with her at the Palm Beach Mall, where they purchased items from Victoria's Secrets. After spending the day together, they went over to the Palm Beach house, where Epstein requested to see what was purchased. She was a little reluctant initially, but because of the fact that it was his money that purchased the items, she showed the outfit that she had purchased at Victoria's Secrets. He had asked her to try it on, at which time she did. She went back to the house at another time, where she was going to meet with [REDACTED] and Epstein. They went for a bike ride, but [REDACTED] had a

massage, which Epstein walked in on while she was getting a massage. He asked her to turn over, expose her breasts to him. I think he performed a chiropractic move on her. And she was completely uncomfortable with the whole situation.

Recarey Dep. Tr. at 106:2-107:20 (June 21, 2016) (McCawley Decl. at Exhibit 5).

Indeed, one of the witnesses who gave testimony in this case, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Even Defendant has admitted [REDACTED] involvement with her and Epstein:

Q. Does [REDACTED] know Jeffrey Epstein?

A. Can you ask again, please?

Q. Does [REDACTED] know Jeffrey Epstein?

A. What do you mean by know?

Q. Has she met her him before?

A. I can't recollect a time when [REDACTED] -- I've seen [REDACTED] with Jeffrey but --

Q. You are not sure --

A. I know they know either other. I can't testify to a meeting between them.

Maxwell Dep. Tr. at 270:18-271:8 (April 22, 2016) (McCawley Decl. at Exhibit 2).

Q. Why do you think that [REDACTED] might know Jeffrey?

A. Because you know, I know Jeffrey.

Maxwell Dep. Tr. at 271:18-22 (April 22, 2016) (McCawley Decl. at Exhibit 2).

Yet, Maxwell now wants this court to believe that she has no responsive communications with [REDACTED] relevant to this case.

C. Defendant's Failures to Search All Email Accounts

Perhaps part of the reason that Defendant has failed to produce responsive document is that still refusing to collect data from all of her email accounts. In particular, Defendant has not collected data from her [REDACTED] account nor produced relevant documents from her [REDACTED] account. Both email accounts are listed as part of Defendant's contact information gathered by the police from Epstein's home, and turned over to the Palm Beach County State Attorney as part of the investigation and prosecution of Epstein:

Ms. Ghislaine Maxwell

Email [REDACTED]

See (DE 280-2), Palm Beach County State Attorney's Office, Public Records Request No.: 16-268, Disc 7 at p. 2305 (GIUFFRE007843).

i. The mindspring.com Account

As evidenced from the police collection above, [REDACTED], was an email address Defendant used while she was with Epstein. *Id.* In her filing with this Court, Defendant represented that this was merely a "spam" account "to use when registering for retail sales notifications and the like," and that it contains no relevant documents. Br. at pg. 8. Of course, if she wasn't using the [REDACTED] or the [REDACTED], what email address *was* Defendant using while she was with Epstein, and why hasn't that account been disclosed and searched? This Court should order Defendant to disclose all email accounts she has used from 1999 to the present.

At any rate, both recent testimony in this case, and older testimony in a related case, completely belies Defendant's claim that her [REDACTED] account was merely for "spam." Jeffrey Epstein's house manager, Juan Alessi testified that [REDACTED] was in daily use by the Epstein household to send and receive messages, a household to which Defendant belonged:

Q. So when there would be a message from one of them while they were out of town, they would call you, call you on the telephone?

A. I haven't spoken to Ghislaine in 12 years.

Q. Sorry. I'm talking about when you worked there and you would receive a message that they were coming into town, would that be by way of telephone?

A. Telephone, and also, there was a system at the house, that it was MindSpring, MindSpring I think it's called, that it was like a message system that would come from the office.

Q. What is MindSpring?

A. It was a server. I think it was -- the office would have, like, a message system between him, the houses, the employees, his friends. They would write a message on the computer. There was no email at that time.

Q. Okay. So what computer would you use?

A. My computer in my office.

Q. And so was part of your daily routine to go to your computer and check to see if you had MindSpring messages?

A. No. That was at the end of my stay. That was the very end of my stay. I didn't get involved with that too much. But it was a message system that Jeffrey received every two, three hours, with all the messages that would have to go to the office in New York, and they will print it and send it faxed to the house, and I would hand it to him.

Q. Did it look like the message pads that we've been looking at?

A. No, no, nothing like that.

Q. Was it typed-out messages?

A. Yes, typed-out messages.

Q. Just explain one example of how it would work. Let's say that Ghislaine wanted to send him a message on MindSpring. How would that work?

A. An example?

Q. Sure.

A. It got so ridiculous at the end of my stay, okay? That Mr. Epstein, instead of talking to me that he wants a cup of coffee, he will call the office; the office would type it; they would send it to me, Jeffrey wants a cup of coffee, or Jeffrey wants an orange juice out by the pool.

Q. He would call the office in New York. They would then type it in MindSpring?

A. Send it to me.

Q. How would you know to check for it? How would you know to look for this MindSpring?

A. Because I was in the office. I was there. I was there. And we have a signal when it come on and says, Hey, you've got mail.

Q. Okay.

A. Every day. Every day it was new things put in. That's why I left, too.

Q. Do you know who set up the mind spring system?

A. It was a computer guy. It was a computer guy who worked only for Jeffrey. Mark. Mark Lumber.

Q. Was he local to Palm Beach?

A. No. He was in New York. Everything was set up from New York. And Mark Lumber, I remember he came to Palm Beach to set up the system at the house.

Alessi Dep. Tr. at 223:5-225:17. (June 1, 2016) (McCawley Decl. at Exhibit 7). Accordingly, mindspring was a server set up for Jeffrey Epstein and his household to use to communicate to one another, and was, in fact, used in this manner.

The sworn testimony of Janusz Banasiak, another of Epstein's house managers, from the case *L.M. v. Jeffery Epstein and Sarah Kellen*,¹ gives a fuller representation of how Defendant, and others in Epstein's sex-trafficking ring, used their accounts on Epstein's mindspring server:

Q. Okay. Were you aware that Mr. Epstein used a Citrix program to link various computers? Did you know that?

A. Yeah. I use Citrix too in my computer for exchanging e-mails and get through Internet.

Q. That's not something that you were, you were privy to? You weren't, you weren't in the loop of the sharing of information in the house in terms of the computers being connected through any server?

A. I don't really know what, how, how to answer your question because Citrix is for the whole organization to exchange e-mail between employees.

Q. All right. You used the term?

A. So, even my computer is connected to Citrix. I can receive mail and I can e-mail information to employee within organization. But I don't know if you can see to each computer what is going on on another computer.

Q. You have used the term organization, you can share within the organization. What do you -- just so I can understand what you're calling the organization, what do you mean by that word?

A. People employed by Jeffrey Epstein. There are a few groups of people, his office in New York and I guess --

Q. Okay. The other people mentioned as co-conspirators are Sarah Kellen, Adriana Ross, and Nadia Marcinkova. So we'll get to them in a minute but first just so we stay on the track of who was in the organization, is Sarah Kellen, Adriana Ross and Nadia Marcinkova all people that you would also consider within the organization?

A. Yes.

Q. Okay. So, we just added three more names to it. **Who else would you consider, Ghislaine Maxwell?**

¹ Case No.: 502008CA28051XXXXMB AB, In the Circuit Court of the Fifteenth Judicial Circuit in and for Palm Beach County, Florida.

A. Yes.

56:13-17; 5:2-14; 58:1-7; 60:21-61:7 (February 16, 2010) (Emphasis added) (McCawley Decl. at Exhibit 8).

Defendant's [REDACTED] email account was part of Epstein's [REDACTED] account through which he communicated with his employees and other members of his household, including his co-conspirators Sarah Kellen, Nadia Marcinkova, and the Defendant. This email account likely has (or had) myriad of communications between and among Defendant and Jeffrey Epstein, Defendant and Sarah Kellen, Defendant and Nadia Marcinkova, and others. This email account is the one *most likely* to have the most relevant documents in this case, as it was used by Jeffrey Epstein and his sex trafficking organization. The fact that this account - an account created for the sole purpose of enabling Defendant and others to communicate with Jeffrey Epstein - has no communications with Epstein or the other co-conspirators, is extremely strong indicia that someone destroyed those email communications. Their destruction warrants an adverse inference instruction. And, at the very least, the Court should direct Defendant to retrieve her data from the Citrix server or any other applicable server upon which the mindspring.com account was hosted.

ii. The [REDACTED] Account

The [REDACTED] account bears Defendant's initials, and, again, listed as part of her contact information gathered by the police from Epstein's home, and turned over to the Palm Beach County State Attorney as part of the investigation and prosecution of Epstein:

Ms. Ghislaine Maxwell

Email [REDACTED]

See (DE 280-2), Palm Beach County State Attorney's Office, Public Records Request No.: 16-268, Disc 7 at p. 2305 (GIUFFRE007843)

Because of Defendant's refusal to search this important email account, any production yielded from any search terms will necessarily be incomplete. Indeed, this failure is particularly prejudicial, as this account appears to be the one she used while she was with Epstein, and therefore, the one she used during the time period Defendant was abusing Ms. Giuffre.

Defendant does not appear to have pursued access to this account very far. This inaction lies in stark contrast to Ms. Giuffre's efforts to recover data. Ms. Giuffre has sent executed releases to Microsoft for her inaccessible account, and even issued a Rule 45 Subpoena to Microsoft for the production of her account data. *See* McCawley Decl. at Exhibit 9, Microsoft Subpoena. At a minimum, the Court should direct the Defendant to take these steps to access the earthlink.net email account.

D. An Adverse Inference Instruction is Appropriate.

In light of this clear and persistent pattern of recalcitrance, the Court should instruct the jury that it can draw an adverse inference that the Defendant has concealed relevant evidence. Defendant has yet to provide responsive information. And even if Defendant were, at this late date, to run Ms. Giuffre's proposed search terms over her data (which has not yet been collected), such a production would be both untimely and prejudicial. Fact discovery has closed. Numerous depositions have already been taken by Ms. Giuffre without the benefit of these documents. The window for authenticating the documents through depositions has shut. Expert reports are due at the end of the month, and Ms. Giuffre's experts do not have the benefit of reviewing these documents. Late production of information robs Ms. Giuffre of any practical ability to use the discovery.

The Second Circuit has stated, “[w]here documents, witnesses, or information of any kind relevant issues in litigation is or was within the exclusive or primary control of a party and is not provided, an adverse inference can be drawn against the withholding party. Such adverse inferences are appropriate as a consequence for failure to make discovery.” *Bouzo v. Citibank, N.A.*, 1993 WL 525114, at *1 (S.D.N.Y. 1993) (internal citations omitted). The Defendant’s continued systemic foot-dragging and obstructionism – even following the Court’s June 20 order – makes an adverse inference instruction with regard to Defendant’s documents appropriate. An adverse inference instruction is appropriate when a party refuses to turn over documents in defiance of a Court Order. *See Lyondell-Citgo Refining, LP v. Petroleos de Venezuela, S.A.*, 2005 WL 1026461, at *1 (S.D.N.Y. May 2, 2005) (denying application to set aside Magistrate Judge Peck’s order entering an adverse inference instruction against defendant for failure to produce documents that the Judge Peck had ordered Defendant to produce). Accordingly, because a “party’s failure to produce evidence within its control creates a presumption that evidence would be unfavorable to that party” an adverse inference should be applied with respect to Defendant’s failure to produce “in order to ensure fair hearing for [the] other party seeking evidence.” *Doe v. U.S. Civil Service Commission*, 483 F. Supp. 539, 580 (S.D. N.Y., 1980) (citing *International Union v. NLRB*, 148 U.S. App. D.C. 305, 312-317, 459 F.2d 1329, 1336-41 (D.C.Cir.1972)).

“An adverse inference serves the remedial purpose of restoring the prejudiced party to the same position he would have been in absent the wrongful destruction of [or willful refusal to produce] evidence by the opposing party.” *Chevron Corp. v. Donziger*, 296 F.R.D. 168, 222 (S.D.N.Y. 2013) (granting an adverse inference when defendants refused to produce documents pursuant to the District Court’s order). Where “an adverse inference ... is sought on the basis that the evidence was not produced in time for use at trial, the party seeking the instruction must

show (1) that the party having control over the evidence had an obligation to timely produce it; (2) that the party that failed to timely produce the evidence had ‘a culpable state of mind’; and (3) that the missing evidence is ‘relevant’ to the party's claim or defense such that a reasonable trier of fact could find that it would support that claim or defense.” *Id.* (citing *Residential Funding Corp. v. DeGeorge Financial Corp.*, 306 F.3d 99, 108 (2d Cir. 2002)).

Furthermore, as discussed in detail in Ms. Giuffre’s Motion for an Adverse Inference Instruction (DE 315), an adverse inference is appropriate regarding the documents that Defendant is withholding under the Second Circuit’s test set forth in *Residential Funding*. Defendant has admitted to deleting emails as this Court noted in its Order. Defendant has not collected what data remains from at least half of her email accounts. An adverse inference is equally appropriate if the non-compliance was due to Defendant’s destruction of evidence. *See Brown v. Coleman*, 2009 WL 2877602, at *2 (S.D.N.Y. Sept. 8, 2009) (“Where a party violates a court order—either by destroying evidence when directed to preserve it or by failing to produce information because relevant data has been destroyed—Rule 37(b) of the Federal Rules of Civil Procedure provides that the court may impose a range of sanctions, including dismissal or judgment by default, preclusion of evidence, imposition of an adverse inference, or assessment of attorneys' fees and costs. Fed. R. Civ. P. 37(b); *see Residential Funding Corp. v. DeGeorge Financial Corp.*, 306 F.3d 99, 106–07 (2d Cir.2002)”). *See also Essenter v. Cumberland Farms, Inc.*, 2011 WL 124505, at *7 (N.D.N.Y. Jan. 14, 2011); and Rule 37(e), Fed. R. Civ. P. (“If electronically stored information that should have been preserved in the anticipation or conduct of litigation is lost because a party failed to take reasonable steps to preserve it . . . the court: (2) only upon finding that the party acted with the intent to deprive another party of the information’s use in the litigation may: (A) presume that the lost information was unfavorable to

the party; (b) instruct the jury that it may or must presume the information was unfavorable to the party; or (C) dismiss the action or enter a default judgment.”).

The Court may also wish to consider the possibility of a having a neutral, third-party expert review Defendant’s production. In her filing with the Court on Monday, August 1, 2016, Defendant represented that she ran hundreds of search terms - including the names of people involved in the sex trafficking ring with whom she still associates in the present - and got zero “hits” for any of them. That is strong indicia that Defendant intentionally deleted documents. This strongly suggests that relevant documents either lie in the two email accounts that were not searched or Defendant has deleted these communications. Defendant does not state that the individual who examined Defendant’s devices attempted to recover Defendant’s deleted email and other documents, or attempted to identify if and when a hard drive was wiped.

In these circumstances, the Court should allow an independent forensic expert review the computer and all her email accounts to determine whether responsive materials exists and have either not been produced or have been deleted. The Court could then use that information in determining whether an adverse inference is appropriate.

III. CONCLUSION

For the reasons set forth above, Ms. Giuffre respectfully request that this Court grant her motion for an adverse inference jury instruction pursuant to Rule 27(b), (e), and (f), with respect to the electronic documents and electronic communications that this Court Ordered her to produce, allow a forensic review of her computer to evaluate whether material was intentionally deleted; and direct Defendant to recover any remaining mindspring.com data from the applicable server.

Dated: August 8, 2016

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley

Sigrid McCawley (Pro Hac Vice)
Meredith Schultz (Pro Hac Vice)
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

Bradley J. Edwards (Pro Hac Vice)
FARMER, JAFFE, WEISSING,
EDWARDS, FISTOS & LEHRMAN, P.L.
425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301
(954) 524-2820

Paul G. Cassell (Pro Hac Vice)
S.J. Quinney College of Law
University of Utah
383 University St.
Salt Lake City, UT 84112
(801) 585-5202²

² This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah for this private representation.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 8th day of August, 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.

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

/s/ Sigrid S. McCawley
Sigrid S. McCawley

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

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

_____/

**DECLARATION OF SIGRID S. MCCAWLEY IN SUPPORT OF PLAINTIFF'S
SUPPLEMENT TO MOTION FOR ADVERSE INFERENCE INSTRUCTION BASED
ON NEW INFORMATION**

I, Sigrid S. McCawley, declare that the below is true and correct to the best of my knowledge as follows:

1. I am a Partner with the law firm of Boies, Schiller & Flexner LLP and duly licensed to practice in Florida and before this Court pursuant to this Court's September 29, 2015 Order granting my Application to Appear Pro Hac Vice.

2. I respectfully submit this Declaration in Support of Plaintiff's Supplement to Motion for Adverse Inference Instruction Based on New Information.

3. Attached hereto as Exhibit 1 is a true and correct copy of July 29, 2016, Correspondence from Ty Gee.

4. Attached hereto as Sealed Exhibit 2 is a true and correct copy of Excerpt from April 22, 2016, Deposition of Ghislaine Maxwell.

5. Attached hereto as Sealed Exhibit 3 is a true and correct copy of Excerpt from July 22, 2016, Deposition of Ghislaine Maxwell.

6. Attached hereto as Sealed Exhibit 4 is a true and correct copy of Excerpts from June 10, 2016, Deposition of Rinaldo Rizzo.

7. Attached hereto as Sealed Exhibit 5 is a true and correct copy of Excerpts from June 21, 2016, Deposition of Detective Joseph Recarey.

8. Attached hereto as Sealed Exhibit 6 is a true and correct copy of Excerpts from May 18, 2016, Deposition of Johanna Sjoberg.

9. Attached hereto as Sealed Exhibit 7 is a true and correct copy of Excerpts from June 1, 2016, Deposition of Juan Alessi.

10. Attached hereto as Sealed Exhibit 8 is a true and correct copy of the sworn testimony of Janusz Banasiak.

11. Attached hereto as Exhibit 9 is a true and correct copy of Rule 45 Subpoena to Microsoft.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Sigrid S. McCawley
Sigrid S. McCawley, Esq.

Dated: August 8, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid S. McCawley
Sigrid S. McCawley (Pro Hac Vice)
Meredith Schultz (Pro Hac Vice)
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

Bradley J. Edwards (Pro Hac Vice)
FARMER, JAFFE, WEISSING,
EDWARDS, FISTOS & LEHRMAN, P.L.
425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301
(954) 524-2820

Paul G. Cassell (Pro Hac Vice)
S.J. Quinney College of Law
University of Utah
383 University St.
Salt Lake City, UT 84112
(801) 585-5202¹

¹ This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah for this private representation.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 8th day of August, 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 to all parties of record via transmission of the Electronic Court Filing System generated by CM/ECF.

Laura A. Menninger, Esq.
Jeffrey Pagliuca, 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
jpagliuca@hmflaw.com

/s/ Sigrid S. McCawley
Sigrid S. McCawley

EXHIBIT 2

(Filed Under Seal)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

VIRGINIA L. GIUFFRE,

Plaintiff,

Case No.:

-against-

15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendants.

- - - - - x

CONFIDENTIAL

Videotaped deposition of GHISLAINE
MAXWELL, taken pursuant to subpoena, was
held at the law offices of BOIES
SCHILLER & FLEXNER, 575 Lexington
Avenue, New York, New York, commencing
April 22, 2016, 9:04 a.m., on the above
date, before Leslie Fagin, a Court
Reporter and Notary Public in the State
of New York.

- - -

MAGNA LEGAL SERVICES
1200 Avenue of the Americas
New York, New York 10026



1 G Maxwell - Confidential

2 asked and answered already.

3 Q. You can answer the question.

4 A. I have no idea what Sarah Kellen
5 did.

6 Q. You never observed Sarah Kellen
7 with girls under the age of 18 at Jeffrey's
8 home?

9 MR. PAGLIUCA: Object to the form
10 and foundation.

11 A. The answer is no, I have no idea.

12 Q. Do you know Glenn Dubin?

13 A. I do.

14 Q. What is your relationship with
15 Glenn Dubin?

16 MR. PAGLIUCA: Object to the form.

17 A. What do you mean what is my
18 relationship.

19 Q. Are you friendly with him, how do
20 you know him?

21 A. He is the husband of Eva Dubin.

22 Q. Is Eva Dubin one of your friends?

23 A. Yes.

24 Q. Did you ever send Virginia to
25 Glenn's condo at the Breakers to give him a

1 G Maxwell - Confidential

2 A. She helps with my not-for-profit
3 ocean foundation and any other related
4 activities that I may have.

5 Q. Is she paid for by Jeffrey Epstein?

6 A. No.

7 Q. She is paid for by you?

8 A. Yes.

9 Q. When did you first meet [REDACTED]
10 [REDACTED]?

11 A. I don't recollect exactly, sometime
12 maybe 2002, 2003.

13 Q. How did you meet her?

14 A. I don't recollect exactly how we
15 met.

16 Q. Did Jeffrey introduce you to her?

17 A. I don't recollect how we met.

18 Q. Does she know Jeffrey Epstein?

19 MR. PAGLIUCA: Objection to the
20 form and foundation.

21 A. Can you ask again, please?

22 Q. Does [REDACTED] know Jeffrey
23 Epstein?

24 A. What do you mean by know?

25 Q. Has she met her him before?

1 G Maxwell - Confidential

2 MR. PAGLIUCA: Objection to the
3 form and foundation.

4 A. I can't recollect a time when
5 [REDACTED] -- I've seen [REDACTED] with Jeffrey but --

6 Q. You are not sure --

7 A. I know they know either other. I
8 can't testify to a meeting between them.

9 Q. Do you know where in New Jersey she
10 lives?

11 A. No

12 Q. You don't know a city?

13 A. No.

14 Q. How long has she worked for you?

15 A. Sometime 2002, 2003.

16 Q. To the present?

17 A. Yeah.

18 Q. Why do you think that [REDACTED]
19 might know Jeffrey?

20 MR. PAGLIUCA: Objection to the
21 form and foundation.

22 A. Because you know, I know Jeffrey.

23 Q. Have you seen them together?

24 A. I already testified I have not seen
25 them together, to my recollection.

1 G Maxwell - Confidential

2 Q. Is it your testimony that [REDACTED]
3 [REDACTED] knows Jeffrey Epstein through the work
4 that she does for you?

5 MR. PAGLIUCA: Objection to the
6 form and foundation.

7 A. I don't recollect, and I don't
8 recollect how I met [REDACTED] and I can't testify
9 to what [REDACTED] relationship is or is not with
10 Jeffrey.

11 Q. Have you ever talked to Jeffrey
12 about [REDACTED]?

13 A. I don't know what you mean.

14 Q. In any way, have you ever had a
15 conversation with Jeffrey about [REDACTED]?

16 A. In what context.

17 Q. In any context. Have you ever
18 talked to Jeffrey Epstein about [REDACTED]?

19 A. [REDACTED] works for me so it's entirely
20 possible that in the course of conversations
21 since 2002, 2003 that a conversation in which
22 [REDACTED] name would have come up is entirely
23 possible.

24 Q. I provided you with and I'm sorry,
25 I don't know all the numbers, but the

1 G Maxwell - Confidential

2 statement that was issued by Ross Gow that
3 should be a single page still in your stack
4 of exhibits there.

5 MR. PAGLIUCA: Exhibit 10.

6 Q. Did you authorize Ross Gow to issue
7 that statement on your behalf in January of
8 2015?

9 A. I already testified that that was
10 done by my lawyers.

11 Q. So did you authorize your lawyers
12 to issue a statement on your behalf through
13 Ross Gow in January of 2015?

14 A. It was determined that I had to
15 make a statement in the United Kingdom
16 because of the appalling lies and I just
17 thought of some new ones.

18 Virginia's statement that I
19 celebrated her 16 birthday with her. We can
20 all agree that that's entirely impossible. I
21 didn't meet her until she was 17 and other
22 lies she perpetrated that she had a diary and
23 we all know is a complete fake. That's not a
24 diary. It was just a book she was writing
25 that you helped sell to the press, as if it

1 G Maxwell - Confidential

2 (Maxwell Exhibit 17, email, marked
3 for identification.)

4 Q. This is an email from you on
5 January 10, 2015 to Philip Barden and Ross
6 Gow. The statement you had before you
7 earlier, that, if you can pull that in front
8 of you, the one page press release that you
9 gave. You might know from memory.

10 Was the press release that you
11 issued with the statement about Virginia
12 issued in or around January 2, 2015?

13 A. As best as I can recollect.

14 Q. I want to turn your attention to
15 the document I just handed you which is Bates
16 No. 001044, from you to Philip Barden and
17 Ross Gow. It says in the first sentence, I'm
18 out of my depth to understand defamation,
19 other legal hazards and I don't want to end
20 up in a lawsuit aimed at me from anyone, if I
21 can help it. Apparently, even saying
22 Virginia is a liar has hazards.

23 You knew at the time you called
24 Virginia a liar in early January of 2015 that
25 that was something that would result in a

1 G Maxwell - Confidential

2 with Virginia Roberts.

3 Q. I'm marking this as Maxwell 25.

4 (Maxwell Exhibit 25, email, marked
5 for identification.)

6 Q. I'm showing you what has been
7 marked as Maxwell 25.

8 This is an email dated January 11,
9 2015 at the top?

10 Do you see that that from Jeffrey
11 to you?

12 A. Uh-huh.

13 Q. And then below there is an email
14 from Philip Barden to you and cc'ing Ross Gow
15 on January 11, 2015.

16 Do you see that?

17 A. Uh-huh.

18 Q. It says, Dear Ghislaine, as you
19 know I have been working behind the scenes
20 and this article comes from that. It helps
21 but doesn't answer the VR claims. I will get
22 the criminal allegations out. This shows the
23 MOS will print truth, not just a VR voice
24 piece. We can only make the truth by making
25 a statement.

1 G Maxwell - Confidential

2 What did he mean when he said, I
3 will get the criminal allegations out, what
4 was he referring to?

5 MR. PAGLIUCA: Objection to the
6 form and foundation.

7 A. I have no idea.

8 Q. Were there criminal allegations
9 about Virginia that either your lawyer or
10 press agent were leaking to the press?

11 MR. PAGLIUCA: Objection to form
12 and foundation.

13 A. I have no idea.

14 Q. Did you ask him what he meant when
15 he said, I will get the criminal allegations
16 out?

17 A. I don't recollect the conversation.

18 Q. Did you direct him to leak to the
19 press criminal allegations about Virginia
20 Roberts?

21 A. I already testified that I have no
22 knowledge of what you are asking me.

23 Q. Were you copied on this email,
24 correct?

25 A. I was.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

CERTIFICATE

I HEREBY CERTIFY that the witness,
GHISLAINE MAXWELL, was duly sworn by me and
that the deposition is a true record of the
testimony given by the witness.



Leslie Fagin

Leslie Fagin,

Registered Professional Reporter

Dated: April 22, 2016

(The foregoing certification of
this transcript does not apply to any
reproduction of the same by any means, unless
under the direct control and/or supervision
of the certifying reporter.)

EXHIBIT 5

(Filed Under Seal)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----x
VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----x

June 21, 2016

9:17 a.m.

C O N F I D E N T I A L

Deposition of JOSEPH RE CAREY, pursuant to notice, taken by Plaintiff, at the offices of Boies Schiller & Flexner, 401 Las Olas Boulevard, Fort Lauderdale, Florida, before Kelli Ann Willis, a Registered Professional Reporter, Certified Realtime Reporter and Notary Public within and for the State of Florida.

1 JOSEPH RECAREY - CONFIDENTIAL

2 Q. Do you remember speaking with a female by
3 the name of [REDACTED]?

4 A. Yes.

5 Q. And is that -- did you learn from [REDACTED]
6 [REDACTED] about [REDACTED]?

7 MR. PAGLIUCA: Object to form and
8 foundation.

9 THE WITNESS: That's correct.

10 BY MR. EDWARDS:

11 Q. And what did you understand [REDACTED]
12 [REDACTED] interaction with Jeffrey Epstein to be?

13 MR. PAGLIUCA: Object to form and
14 foundation.

15 THE WITNESS: [REDACTED] was allegedly
16 dating Jeffrey Epstein at the time. And [REDACTED]
17 and [REDACTED] were roommates.

18 During that time, [REDACTED] had met with [REDACTED]
19 and went shopping with her at the Palm Beach
20 Mall, where they purchased items from
21 Victoria's Secrets.

22 After spending the day together, they went
23 over to the Palm Beach house, where Epstein
24 requested to see what was purchased. She was a
25 little reluctant initially, but because of the

1 JOSEPH RECAREY - CONFIDENTIAL

2 fact that it was his money that purchased the
3 items, she showed the outfit that she had
4 purchased at Victoria's Secrets. He had asked
5 her to try it on, at which time she did.

6 She went back to the house at another
7 time, where she was going to meet with [REDACTED]
8 and Epstein. They went for a bike ride, but
9 [REDACTED] had a massage, which Epstein walked in on
10 while she was getting a massage.

11 He asked her to turn over, expose her
12 breasts to him. I think he performed a
13 chiropractic move on her. And she was
14 completely uncomfortable with the whole
15 situation.

16 BY MR. EDWARDS:

17 Q. Did you ever attempt to interview [REDACTED]
18 [REDACTED]?

19 A. I'm trying to recall. I believe I may
20 have. I just -- off the top of my head, I can't
21 remember whether I did or didn't.

22 Q. Okay. At some point in time did you
23 encounter Alan Dershowitz?

24 MR. PAGLIUCA: Object to form and
25 foundation.

2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

CERTIFICATE OF OATH

STATE OF FLORIDA)
COUNTY OF MIAMI-DADE)

I, the undersigned authority, certify
that JOSEPH RECAREY personally appeared before me
and was duly sworn.

WITNESS my hand and official seal this
24th day of June, 2016.

KELLI ANN WILLIS, RPR, CRR
Notary Public, State of Florida
My Commission No. EE911443
Expires: 2/16/16

+ + + + +

EXHIBIT 6

(Filed Under Seal)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----x

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----x

May 18, 2016

9:04 a.m.

C O N F I D E N T I A L

Deposition of JOHANNA SJOBERG, pursuant to notice, taken by Plaintiff, at the offices of Boies Schiller & Flexner, 401 Las Olas Boulevard, Fort Lauderdale, Florida, before Kelli Ann Willis, a Registered Professional Reporter, Certified Realtime Reporter and Notary Public within and for the State of Florida.

1 Q. And what -- do you recall any observations
2 about [REDACTED] when you met her?

3 A. To speak with, she was a little rough
4 around the edges, and I could see the progression of
5 her being groomed a little. They got her braces.
6 She had terrible posture. And with a lot of
7 massages, she learned to stand up straight. So I
8 just saw her become a much more confident person.

9 Q. Do you recall how old she was when you
10 first met her?

11 A. I assumed she was 18, but I do not know
12 her age.

13 MS. McCAWLEY: We're going to take a break
14 really quickly and then we will be back. So we
15 are going to go off the record.

16 THE VIDEOGRAPHER: Off the record at 9:48.

17 (Thereupon, a recess was taken, after
18 which the following proceedings were held:)

19 THE VIDEOGRAPHER: On the record at 9:58.

20 BY MS. McCAWLEY:

21 Q. I'm just going to resume. I have a few
22 more questions for you.

23 You mentioned visiting the US Virgin
24 Islands.

25 Do you recall doing any activities with

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

CERTIFICATE OF OATH

STATE OF FLORIDA)
COUNTY OF MIAMI-DADE)

I, the undersigned authority, certify
that JOHANNA SJOBERG personally appeared before me
and was duly sworn.

WITNESS my hand and official seal this
18th day of May, 2016.

KELLI ANN WILLIS, RPR, CRR
Notary Public, State of Florida
My Commission No. FF911443
Expires: 2/16/21

+ + + + + + + + + + + + + + + +

EXHIBIT 7

(Filed Under Seal)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----x

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----x

June 1, 2016

9:12 a.m.

C O N F I D E N T I A L

Deposition of JOHN ALESSI, pursuant to notice, taken by Plaintiff, at the offices of Boies Schiller & Flexner, 401 Las Olas Boulevard, Fort Lauderdale, Florida, before Kelli Ann Willis, a Registered Professional Reporter, Certified Realtime Reporter and Notary Public within and for the State of Florida.

1 JOHN ALESSI

2 Q. You never received emails from either of
3 them?

4 A. No, sir.

5 Q. So when there would be a message from one
6 of them while they were out of town, they would call
7 you, call you on the telephone?

8 A. I haven't spoken to Ghislaine in 12 years.

9 Q. Sorry. I'm talking about when you worked
10 there and you would receive a message that they were
11 coming into town, would that be by way of telephone?

12 A. Telephone, and also, there was a system at
13 the house, that it was MindSpring, MindSpring I
14 think it's called, that it was like a message system
15 that would come from the office.

16 Q. What is MindSpring?

17 A. It was a server. I think it was -- the
18 office would have, like, a message system between
19 him, the houses, the employees, his friends. They
20 would write a message on the computer. There was no
21 email at that time.

22 Q. Okay. So what computer would you use?

23 A. My computer in my office.

24 Q. And so was part of your daily routine to
25 go to your computer and check to see if you had

1 JOHN ALESSI

2 MindSpring messages?

3 A. No. That was at the end of my stay. That
4 was the very end of my stay. I didn't get involved
5 with that too much. But it was a message system
6 that Jeffrey received every two, three hours, with
7 all the messages that would have to go to the office
8 in New York, and they will print it and send it
9 faxed to the house, and I would hand it to him.

10 Q. Did it look like the message pads that
11 we've been looking at?

12 A. No, no, nothing like that.

13 Q. Was it typed-out messages?

14 A. Yes, typed-out messages.

15 Q. Just explain one example of how it would
16 work. Let's say that Ghislaine wanted to send him a
17 message on MindSpring. How would that work?

18 A. An example?

19 Q. Sure.

20 A. It got so ridiculous at the end of my
21 stay, okay? That Mr. Epstein, instead of talking to
22 me that he wants a cup of coffee, he will call the
23 office; the office would type it; they would send it
24 to me, Jeffrey wants a cup of coffee, or Jeffrey
25 wants an orange juice out by the pool.

1 JOHN ALESSI

2 Q. He would call the office in New York.
3 They would then type it in MindSpring?

4 A. Send it to me.

5 Q. How would you know to check for it? How
6 would you know to look for this MindSpring?

7 A. Because I was in the office. I was there.
8 I was there. And we have a signal when it come on
9 and says, Hey, you've got mail.

10 Q. Okay.

11 A. Every day. Every day it was new things
12 put in. That's why I left, too.

13 Q. Do you know who set up the mind spring
14 system?

15 A. It was a computer guy. It was a computer
16 guy who worked only for Jeffrey. Mark. Mark
17 Lumber.

18 Q. Was he local to Palm Beach?

19 A. No. He was in New York. Everything was
20 set up from New York. And Mark Lumber, I remember
21 he came to Palm Beach to set up the system at the
22 house.

23 Q. Did you become aware at some point in time
24 that there was a bag or a briefcase of cash that was
25 in the house?

EXHIBIT 8

(Filed Under Seal)

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL
CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA
CASE NO:502008CA028051XXXXMB AB

L.M.

Plaintiff,

-vs-

JEFFREY EPSTEIN
AND SARAH KELLEN,

Defendants.

_____ /

DEPOSITION OF JANUSZ BANASIAK

Tuesday, February 16, 2010
10:09 - 2:30 p.m.

250 Australian Avenue South
Suite 1500
West Palm Beach, Florida 33401

Reported By:
Cynthia Hopkins, RPR, FPR
Notary Public, State of Florida
Prose Court Reporting
Job No.: 1317

(561) 832-7500 PROSE COURT REPORTING AGENCY, INC. (561) 832-7506

1 A. One was in cabana. One, the other second one
2 was in living room and one was in small office next to
3 the kitchen.

4 Q. All right. In your time at the house
5 prior to that, is it fair to say those computers had
6 never been removed before?

7 A. I remember that there was to bring some new
8 ones to replace them at some point. I don't know
9 remember exactly if it was for upgrading, but they
10 change computers very often I would say.

11 Q. All right. But the computers -- the
12 removal by Adriana and this individual, that wasn't
13 done -- we're talking about a different -- that's
14 not a time where they were replacing computers.
15 This was just removing computers from the house?

16 A. Yes.

17 Q. And did you receive any explanation as to
18 why the computers were being removed from the house?

19 A. No.

20 Q. Did you ever have occasion to use any of
21 the three computers that were removed from the
22 house?

23 A. No. I never, I never, you know, touch them,
24 never use them. I have my own computer in my office, so
25 I use this computer.

1 Q. Is your computer in your office --

2 A. Yes.

3 Q. Let me finish. Is the computer in your
4 office linked up with the three computers that were
5 removed from the house? Meaning, can you look at
6 the system and see what is on those three computers?

7 A. No, no.

8 Q. Is it your understanding that those three
9 computers are linked with one another or do you
10 know?

11 A. I don't know, but I, I doubt it. They are
12 separate I guess.

13 Q. Okay. Were you aware that Mr. Epstein
14 used a Citrix program to link various computers?
15 Did you know that?

16 A. Yeah. I use Citrix too in my computer for
17 exchanging e-mails and get through Internet.

18 Q. Okay. So, is it your understanding that
19 the only connection then through Citrix with these
20 computers, these various computers that were in
21 Mr. Epstein's home, was for e-mail purposes?

22 A. Yes.

23 Q. Okay. To your knowledge, you're not
24 familiar with those computers sharing other files or
25 information?

1 A. No.

2 Q. That's not something that you were, you
3 were privy to? You weren't, you weren't in the loop
4 of the sharing of information in the house in terms
5 of the computers being connected through any server?

6 A. I don't really know what, how, how to answer
7 your question because Citrix is for the whole
8 organization to exchange e-mail between employees.

9 Q. All right. You used the term?

10 A. So, even my computer is connected to Citrix.
11 I can receive mail and I can e-mail information to
12 employee within organization. But I don't know if you
13 can see to each computer what is going on on another
14 computer.

15 Q. You don't know about --

16 A. Is that your question?

17 Q. You don't know about shared files?

18 A. No.

19 Q. You only know that the one computer can
20 e-mail the other?

21 A. Right.

22 Q. But that can happen with any two computers
23 in the world pretty much. You can send e-mails to
24 each other, right.

25 A. Yes.

1 Q. You have used the term organization, you
2 can share within the organization. What do you --
3 just so I can understand what you're calling the
4 organization, what do you mean by that word?

5 A. People employed by Jeffrey Epstein. There are
6 a few groups of people, his office in New York and I
7 guess --

8 Q. Who are those people by name that you
9 would consider within the Jeffrey Epstein
10 organization?

11 A. His accountant, his --

12 Q. Who is that?

13 A. Bella Klen.

14 Q. What is it?

15 A. Bella Klen. K-l-i-n. E-n, I'm sorry.

16 Q. Bella, B-e-l-l-a?

17 A. Yes.

18 Q. Is that somebody in New York?

19 A. Yes.

20 Q. Is that a male or female?

21 A. Female.

22 Q. And you understand that's his accountant?

23 A. Right.

24 MR. GOLDBERGER: Just to get the spelling
25 correct is it K-l-e-i-n?

1 THE WITNESS: K-l-e-n.

2 MR. MERMELSTEIN: K-l-e-n.

3 BY MR. EDWARDS:

4 Q. And in addition to Bella Klen, who else
5 would you have considered to be in Jeffrey Epstein's
6 organization?

7 A. Rich Kahn. Richard Kahn.

8 Q. And how do you spell the last name?

9 A. K-a-h-n.

10 Q. And where is he located?

11 A. New York office.

12 Q. What does he do?

13 A. I guess he was involved with the accounting.

14 Q. And who else?

15 A. Leslie. I would think I would say secretary.

16 Q. Leslie Groff?

17 A. Yes.

18 Q. And is she also in the New York office?

19 A. Yes.

20 Q. What do you understand her role to be?

21 A. Secretary I would say.

22 Q. Did she also schedule appointments for
23 these young females to come to Jeffrey Epstein's
24 house?

25 MR. GOLDBERGER: Form.

1 THE WITNESS: I don't know.

2 BY MR. EDWARDS:

3 Q. We'll go back to that but I tell you why I
4 ask. If you don't know then you don't know, but in
5 the course of Mr. Epstein's -- you're aware that he
6 did plead guilty to a couple felonies in state
7 court, right?

8 A. Right.

9 Q. Well, in the course of the negotiation
10 with the federal government and the U.S. Attorney's
11 Office, they, the agreement between Mr. Epstein and
12 the U.S. Attorney's office mentions people that are
13 called co-conspirators of Epstein. And Leslie Groff
14 is named as one of those co-conspirators.

15 Do you know what involvement, if any, that
16 she had with the crimes that were being
17 investigated?

18 A. No.

19 Q. Okay.

20 A. I am not aware of this.

21 Q. Okay. The other people mentioned as
22 co-conspirators are Sarah Kellen, Adriana Ross, and
23 Nadia Marcinkova. So we'll get to them in a minute
24 but first just so we stay on the track of who was in
25 the organization, is Sarah Kellen, Adriana Ross and

1 Nadia Marcinkova all people that you would also
2 consider within the organization?

3 A. Yes.

4 Q. Okay. So, we just added three more names
5 to it. Who else would you consider, Ghislaine
6 Maxwell?

7 A. Yes.

8 Q. And who else?

9 A. Who was working there?

10 Q. Bella, Richard Kahn, Leslie Groff,
11 Ghislaine Maxwell, Nadia, Sarah, Adriana.

12 A. I think Harry was involved with the
13 accounting.

14 Q. Okay.

15 A. I don't recall his last name.

16 Q. Somebody else involved with the
17 accounting?

18 A. Yes.

19 Q. Okay. Any of those people that you just
20 named, were any of those people that you just named
21 the person that you described as the gentleman that
22 assisted Adriana in removing the computers from the
23 house prior to the search warrant being executed?

24 A. No. You mean the one who show up to do those
25 computers?

1 Q. Right. The one who helped Adriana move
2 it.

3 A. No, it wasn't.

4 Q. Had you ever seen that individual on the
5 property, on Mr. Epstein's property at 358 Albrillo
6 Way prior to him assisting Adriana in removing the
7 computers from the home?

8 A. No.

9 Q. That was their first time seeing him?

10 A. Yes.

11 Q. Had you ever seen him since that date?

12 A. No.

13 Q. And to this date you don't know who that
14 individual was?

15 A. No.

16 Q. Were you told that the -- let me rephrase
17 that. I guess you told me that anything that
18 happened in the home in terms of guests coming over
19 or things of that nature, you would be forewarned
20 about it, right?

21 A. Right.

22 Q. So, when was the first time that you
23 learned that Adriana and some gentleman that you had
24 never met would be coming to the home to remove the
25 computers?

1 A. I got the phone call from her that there would
2 be -- I don't know what time it was in the house in
3 certain time and they would pick up those computers.

4 Q. Okay. And you got a phone call from
5 Adriana?

6 A. Right.

7 Q. Why were you called by Adriana to tell you
8 that Adriana and would be coming over to, with some
9 other gentleman to remove the computers. Do you
10 know why you were told that?

11 A. No.

12 Q. Would Adriana call every time she would
13 come over?

14 A. Yes.

15 Q. Okay.

16 A. I mean, any, any time coming to the house,
17 they always let me know who is coming when they are
18 arriving or whatever.

19 Q. Back in 2000, sorry.

20 A. I said even if Jeffrey Epstein arriving at the
21 house, I always know what time and which day he would be
22 here or another person, so I would be aware of what was
23 going on and I would be prepared.

24 Q. Who besides you back in 2005 lived at the
25 house full time; just you?

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

CERTIFICATE OF OATH

THE STATE OF FLORIDA
COUNTY OF PALM BEACH

I, the undersigned authority, certify that
JANUSZ BANASIAK personally appeared before me
and was duly sworn on the 16th day of February,
2010.

Dated this 28th day of February, 2010.

Cynthia J. Hopkins



Cynthia Hopkins, RPR, FPR
Notary Public - State of Florida
My Commission Expires: February 25, 2011
My Commission No.: DD 643788

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
VIRGINIA L. GIUFFRE,
Plaintiff,
v.
GHISLAINE MAXWELL,
Defendant.
-----X

15-cv-07433-RWS

**Response in Opposition to Plaintiff's Motion to Enforce the Court's Order and
Direct Defendant to Answer Deposition Questions Filed Under Seal**

Laura A. Menninger
Jeffrey S. Pagliuca
HADDON, MORGAN, AND FOREMAN, P.C.
East 10th Avenue
Denver, CO 80203
303.831.7364

TABLE OF CONTENTS

| | |
|---|----|
| INTRODUCTION | 1 |
| FACTUAL BACKGROUND | 2 |
| I. PLAINTIFF’S FAILURE TO IDENTIFY THE SPECIFIC QUESTIONS CLAIMED
UNANSWERED REQUIRES DENIAL OF THE MOTION | 8 |
| II. THE REQUESTED TOPIC AREAS ARE CUMULATIVE, DUPLICATIVE AND NO
GOOD CAUSE EXISTS FOR PERMITTING ADDITIONAL DEPOSITION TIME..... | 10 |
| III. COUNSEL INSTRUCTED MAXWELL NOT TO ANSWER TO ENFORCE THE
COURT’S ORDER AND TO PREVENT HARASSMENT BY PLAINTIFF’S COUNSEL
..... | 13 |
| A. Objected to Question Number 1: | 13 |
| B. Objected to Questions Number 2 and 3. | 14 |
| C. “Objected” to Question Number 4. | 15 |
| D. “Objected” to Question Number 5 | 15 |
| E. “Objected” to Question Number 6 | 15 |
| F. Objected to Question Number 7 | 16 |
| G. Objection to Question Number 8 | 17 |
| H. Objections to Questions 9, 10, and 11. | 17 |
| CERTIFICATE OF SERVICE..... | 25 |

Defendant Ghislaine Maxwell, by and through her counsel, hereby submits the following Response in Opposition (“Response”) to Plaintiff’s Motion to Enforce the Court’s Order and Direct Defendant to Answer Deposition Questions Filed Under Seal (“Motion”), as follows:

INTRODUCTION

This lawsuit presents one relatively simple question: is Plaintiff’s claim that she was sexually abused, sexually trafficked and held as a “sex slave” by Jeffrey Epstein between 1999 and 2002 “with the assistance and participation of” Ms. Maxwell substantially true? Plaintiff already has admitted, under oath, that substantial portions of her story are untrue; she has so far refused to say under oath what other lies printed by the press about her story are untrue, but has admitted that journalist Sharon Churcher “got it wrong.” For example, Plaintiff has admitted that she did not meet Ms. Maxwell or Mr. Epstein in 1999 (or in 1998) at the age of 14 or 15, as she previously has sworn and as she told members of the press. Declaration of Jeffrey S. Pagliuca (“Pagliuca Decl.”), Composite Ex. A (Testimony of Plaintiff Virginia Giuffre on May 3, 2016), at 26-27, 220-226. Plaintiff admitted that she did not spend her sweet 16th birthday with Mr. Epstein and Ms. Maxwell as she included in her book manuscript, her Jane Doe #102 Complaint and in the story she sold to the Daily Mail. *Id.* at 102. Plaintiff’s counsel has admitted that it was a mistake to sue Alan Dershowitz for defamation, after he provided them documentation establishing he never was in their client’s presence, nor did he have sex with her. Pagliuca Decl., Ex. B. And Plaintiff’s story about attending a dinner party with Bill Clinton on Little St. James was debunked by none other than former FBI head, Louis Freeh. *Id.*

Yet, undeterred, Plaintiff and her counsel continue to use this lawsuit to seek discovery of matters far afield of the one simple question posed in the defamation claim, to explore events that occurred well past 2002, when Plaintiff lived in Australia and had no contact with Ms. Maxwell or Mr. Epstein. The current witch-hunt has now expanded into the private personal life

of defendant Ghislaine Maxwell. The harassing, extended, repetitive, cumulative and redundant continued deposition of Ms. Maxwell should be concluded.

FACTUAL BACKGROUND

On April 22, 2016 Plaintiff deposed Ms. Maxwell for a full seven hours. The transcript of that deposition is 418 pages long. Ms. Maxwell did not assert any privilege against self-incrimination and was questioned extensively about, among other things: her relationship with Jeffrey Epstein, her knowledge of “sexual trafficking,” sex with minors, non-consensual sex, sex involving the Plaintiff and others, sex involving Plaintiff and Mr. Epstein, sex involving the Plaintiff and Ms. Maxwell, sex involving the Plaintiff, Ms. Maxwell and Mr. Epstein. She was asked questions about whether she recruited girls for Ms. Epstein to have sex with, her knowledge of Ms. Epstein’s sex with a number of people. She was asked questions about “sex toys,” pornographic images, child pornography, and nudity at Mr. Epstein’s house. Ms. Maxwell answered these questions, and many others, to the best of her ability. *See* Pagliuca Decl., Composite Exhibit C (Transcript of (First) Deposition of Ghislaine Maxwell on April 22, 2016).

During her **first** deposition, Ms. Maxwell was freely questioned and testified about the following:

- She never had a sexual encounter with Plaintiff, ever. *Id.* at 76:3-11.
- She never saw Plaintiff massage Mr. Epstein. *Id.* at 75:12-24.
- She never saw Jeffrey Epstein and Plaintiff in a sexual situation. *Id.* at 75:23- 76:l.
- She did not have a set of outfits for Plaintiff to wear. *Id.* at 69:1-24, and again at 117:4-15.
- She had no knowledge of any non-consensual sex acts involving Mr. Epstein. *Id.* at 55:5-15.
- She never had non-consensual sex with anyone. *Id.* at 62:19-20 & 63:23-25.

- She did not train Plaintiff to “recruit” other girls for massages or sexual massages. *Id.* at 81:21- 82:7.
- She never arranged for or asked Plaintiff to have sex with anyone. *Id.* at 58:6-11.
- She never gave a massage with Plaintiff in the room with Mr. Epstein. *Id.* at 19:16-21.
- She never gave a massage to Mr. Epstein with a female that was under the age of 18 in the room. *Id.* at 22:11-14.
- She never observed Mr. Epstein having a massage given by an individual, a female, who was under the age of 18. *Id.* at 22:15-18.
- She never had sex with [REDACTED]. *Id.* at 38:19-23.
- She never observed Jeffrey Epstein having sex with [REDACTED]. *Id.* at 38:24- 39:2.
- She was unaware if Jeffrey Epstein was having sexual contact with [REDACTED] when she was 13 years old. *Id.* at 39:3-5.
- She was never involved in an orgy with [REDACTED]. *Id.* at 40:16-18.
- She had no knowledge of whether [REDACTED] was involved with sex with Jeffrey Epstein and girls over the age of 18. *Id.* at 46:13-16.
- She had no knowledge of whether [REDACTED] recruited other girls for sex with Jeffrey Epstein. *Id.* at 46:17-21.
- She did not know the precise nature of Jeffrey Epstein’s relationship with Sara Kellen. *Id.* at 48:5-6.
- She was unaware of any sexual acts with masseuses and Jeffrey Epstein that were non-consensual. *Id.* at 55:5-15.
- She discussed her knowledge of Annie Farmer. *Id.* at 55:17- 56:20.
- She had no knowledge of Annie Farmer telling the police that Jeffrey Epstein sexually assaulted her. *Id.* at 56:16-20.
- She had no knowledge of Emmy Taylor having sex with Jeffrey Epstein. *Id.* at 65:10-15.
- She never had sex with Jeffrey Epstein, Plaintiff, and Emmy Taylor. *Id.* at 65:8-10.
- She had no knowledge of Emmy Taylor bringing females to the house to massage Jeffrey Epstein. *Id.* at 67:5-13.
- She had no knowledge about a basket of sex toys. *Id.* at 70:25- 75:4 and again at 242:3-243:13.

- She was unaware of Jeffrey Epstein ever having his nipples pinched while having sex with a minor. *Id.* at 82:23-83:4.
- She never met anyone underage in London to provide a massage for Jeffrey Epstein. *Id.* at 97:25-98:5.
- She had no knowledge about Jean Luc Brunel bringing girls to Jeffrey Epstein for the purpose of providing massages. *Id.* at 99:2-21.
- She never participated in obtaining visas for foreign girls. *Id.* at 100:9.
- She did not believe it was Jeffrey Epstein's preference to start sex with a massage. *Id.* at 100:10-20.
- She never trained a female under the age of 18 at Jeffrey Epstein's home. *Id.* at 157:5-10.
- She has no knowledge whether [REDACTED] ever asked females to come over to see Jeffrey Epstein for the purpose of sexual massage. *Id.* at 268:21-24.
- She had no knowledge of any sexual relationship between Jeffrey Epstein and Anouska DiGeorgio. *Id.* at 305:5-23.
- She was aware of [REDACTED] and understood that she was Jeffrey Epstein's girlfriend and spent a lot of time with him in 1999-2000. *Id.* at 364:5-365:11.

Because Ms. Maxwell had not, by virtue of becoming a defendant in this case, injected her entire personal sexual history into this litigation counsel for Ms. Maxwell, during the first 7 hour deposition, instructed Ms. Maxwell to not answer questions related to consensual sexual activity with adults. No objection was raised, and no instruction to not answer lodged, to questions regarding Ms. Maxwell's knowledge of sexual activity (consensual or non-consensual) by Mr. Epstein or others with children, Plaintiff, or other persons. No objections were made, or instructions to not answer, to questions about whether Ms. Maxwell assisted Mr. Epstein in the alleged sexual trafficking of the Plaintiff from 1999 to 2002. Ms. Maxwell answered questions about sexual trafficking, prostitution, her job with Mr. Epstein, and police reports related to Mr. Epstein. Ms. Maxwell was questioned, without any instruction not to answer, about message pads, phone lists, the hiring practices related to massages, hiring practices in general, whether Jeffrey Epstein had a scheme to recruit underage girls for sexual massages and whether Jeffrey

Epstein's assistants would arrange times for underage girls to perform sexual massages. Pagliuca Decl., Ex. C at 253-55. She was extensively questioned about various message pads recovered from Jeffrey Epstein's home by the Palm Beach Police Department. *Id.* at 147:23-167:23. She was extensively questioned regarding her knowledge about Johanna Sjoberg. *Id.* at 307:6-312:12. She was extensively questioned about a list containing names and phone numbers under the heading "Massage Florida." *Id.* at 313:18 – 334:8. Simply stated, with the exception of her adult consensual sex life, Plaintiff was free to question Ms. Maxwell, and in fact questioned Ms. Maxwell on any topic. Importantly, Plaintiff's original motion recognized this fact, seeking only to response Plaintiff on one subject: "Defendant should be ordered to sit for a follow-up deposition and directed to answer questions regarding her knowledge of alleged "adult" sexual activity." Plaintiff's Motion to Compel Deposition Questions, WHEREFORE Clause, at 10 (Doc. # 143).

On June 20, 2016 the Court issued its Order allowing Ms. Maxwell to be re-deposed on a limited basis. The Court authorized questioning relating to:

1. Ms. Maxwell's sexual activity with or involving Jeffrey Epstein;
2. Ms. Maxwell's sexual activity with or involving the Plaintiff;
3. Ms. Maxwell's sexual activity with or involving underage females;
4. Ms. Maxwell's sexual activity involving or including massage with individuals Ms. Maxwell knew were or were likely involved with Mr. Epstein;
5. Ms. Maxwell's knowledge of sexual activities of others with or involving Epstein;
6. Ms. Maxwell's knowledge of sexual activities of others with or involving Plaintiff;
7. Ms. Maxwell's knowledge of sexual activity of others with underage females known to Epstein or believed to be known to Epstein;
8. Ms. Maxwell's knowledge of sexual activity of others involving massage with individuals Ms. Maxwell knew or believed might be known to Epstein.

The continued deposition was expressly limited to the above eight categories, and the Court instructed that Ms. Maxwell “need not answer questions that relate to none of these subjects or that is clearly not relevant, such as sexual activity of third-parties who bear no knowledge or relation to key events, individuals, or locations of this case.” Order of June 20, 2016 at 10 (Doc. # 264-1). Presumably the Court did not authorize repetitive questioning about topics that had been asked and answered in the prior deposition.

Ms. Maxwell had already been subjected to, and fully answered, questions related the majority of the 8 topics in her first 7-hour deposition. Questions related to topics 2, 3, 5, 6, and 7 had all been answered in the negative, *i.e.*, Ms. Maxwell did not have any sexual contact with the Plaintiff (2), did not have sexual contact with any underage females (3), did not have any sexual contact with anyone during a massage (4); had no knowledge of Epstein’s sexual activity other than with Ms. Maxwell (5); had no knowledge of sexual activity with others and the Plaintiff (6); and Ms. Maxwell’s knowledge of sexual activity of others with minors. Topics 4 and 8 had been substantially answered, in the negative. The instruction not to not to answer questions about sexual activity and massages was limited to any activity involving consensual adults. *See* Plaintiff’s Motion to Compel Deposition Questions at 10 (Doc. #143).

Given that the majority of the questions had already been posed and answered over a full seven-hour time period one might reasonably assume that Ms. Maxwell’s second deposition would be short and direct. Unfortunately, Plaintiff’s counsel chose to ignore the Court’s Order, repeatedly sought to reopen previously completed deposition topics and tried to ask questions about new topics completely unrelated to the limited purpose authorized. Pagliuca Decl., Ex. D (Transcript of (Second) Deposition of Ghislaine Maxwell on July 22, 2016). The entire deposition was far beyond the specific request made by Plaintiff in her Motion that Ms. Maxwell

be required to answer questions about adult consensual sexual activity – the only questions on which instructions were given in the first deposition. Yet, broad latitude was given by counsel in the deposition, permitting pages of duplicative, redundant examination on countless topics which had already been asked and fully answer in the first disposition. By way of example:

| Duplicative Topic of Questioning | First Deposition (Exhibit C) | Second Deposition (Exhibit D) |
|--|--|--------------------------------------|
| Circumstances surrounding her first meeting of Plaintiff and if she held herself out as a professional masseur | 14:9-19:18
35:11-36:20
213:5-220:3 | 65:4-70:5 |
| If she saw women under the age of 18 (first deposition) or 21 (second deposition) at Epstein's houses | 12:22-14:8;
22:15-24:9;
99:2-100:4;
122:19-122:14 | 71:20-73:18 |
| Her knowledge of Ms. Sjoberg, her job, how she was hired, and if Ms. Maxwell ever received massages from Ms. Sjoberg | 59:7-63:16;
286:23-293:13;
307:6-312:12 | 74:2-78:19 ¹ |
| Knowledge of or meetings with Maria or Annie Farmer | 55:20-56:20;
62:21-25 | 95:14-98:10;
103:19-113:22 |
| Her knowledge of Nadia Marcinkova and interactions with Mr. Epstein | 40:19-47:14 | 120:22-122:5;
126:22-129:12 |

¹ Consistent with Ms. Maxwell's testimony, Ms. Sjoberg testified that 1) all massages she gave to Ms. Maxwell were ordinary professional massages, and never of a sexual nature; 2) Ms. Maxwell and she never engaged in any sexual activity, nor was it ever requested; and 3) all interactions she had at Mr. Epstein's property of a sexual nature were consensual activities while she was an adult. Pagliuca Decl., Ex. E, at 94-96; 101; *see generally* Response at 20-21, *infra*.

| Duplicative Topic of Questioning | First Deposition (Exhibit C) | Second Deposition (Exhibit D) |
|--|--|-------------------------------|
| Her knowledge of Sara Kellen, when she last spoke to Ms. Kellen, what Ms. Kellen’s job was, and her knowledge of sexual relations between Ms. Kellen and Mr. Epstein | 47:15-49:18;
56:21-57:11;
254:25-256:8;
328:21-329:6;
396:4-21;
411:14-412:22 | 117:14-118:9;
125:2-126:21 |
| Her interactions with Alfredo Rodriguez | 329:7-330:12;
331:9-335:10 | 129:15-132:6 |
| Her knowledge concerning Jean Luc Brunel’s sexual activities or interaction with Mr. Epstein | 379:22-380:18;
99:14-21;
116:19-117:3;
166:21-167:23 | 150:6-17 |
| Her knowledge of the identities of a list name titled “Massage – Florida” from an address book marked in the first deposition and discussed at length | 312:15-334:8 | 179:16 -184:15 |

THE QUESTIONS

I. PLAINTIFF’S FAILURE TO IDENTIFY THE SPECIFIC QUESTIONS CLAIMED UNANSWERED REQUIRES DENIAL OF THE MOTION

Plaintiff broadly, and inaccurately, claims now that at her second deposition, Ms. Maxwell “refused to answer many questions” related to sexual activity or “refused to answer questions about subject integral to this lawsuit.” Motion at 3-4. This assertion is patently dispelled by a review of the second deposition transcript which is 193 pages long. Pagliuca Decl., Ex. D. The deposition began at 9:04 a.m. and concluded at 2:51 p.m. The total time Ms. Maxwell testified in this deposition was 4 hours and 52 minutes for a total combined deposition

time of 11 hours and 52 minutes. A total of 787 questions were posed to Ms. Maxwell in the second deposition. Ms. Maxwell answered every question posed to her that fell within the scope of the June 20 Order, many that were outside the scope, and countless questions that had been asked and answered in her first deposition.

It is difficult to discern precisely what questions Plaintiff is complaining about in her Motion because of her generalized and non-specific complaints. Plaintiff fails to cite to a single instruction not to answer that 1) falls within the scope to the Court's Order and 2) that was not answered when properly rephrased to fall within the scope of the Order. S.D.N.Y. Local Rules require that:

A party seeking or opposing relief under Fed. R. Civ. P. 26 through 37 inclusive, or making or opposing any other motion or application, **shall quote or attach only those portions of the depositions, interrogatories, requests for documents, requests for admissions, or other discovery or disclosure materials, together with the responses and objections thereto, that are the subject of the discovery motion or application, or that are cited in papers submitted in connection with any other motion or application.** See also Civil Local Rule 37.1.

The failure to comply with Rule 37.1 and set forth the particular questions or responses Plaintiff claims are deficient is “enough to require denial of the motion.” *Sibley v. Choice Hotels Int'l*, No. CV 14-634 (JS) (AYS), 2015 WL 9413101, at *5 (E.D.N.Y. Dec. 22, 2015) (denying motion to compel where party failed to identify the specific questions and responses to interrogatories claimed deficient); *see also Kilkenney v. Greenberg Traurig, LLP*, No. 05 CIV. 6578NRB, 2008 WL 371808, at *1 (S.D.N.Y. Feb. 7, 2008) (denying motion to compel where specific questions and objection were not provided, noting rule 37.1 is “This is not an academic or ritual requirement. . . . Court cannot be tasked with performing the functions of Kilkenney's legal counsel [by identifying claimed deficiencies] and thereby seen as advocating for one party over another.”); *Frattalone v. Markowitz*, No. 91 CIV. 5854 (LMM), 1994 WL 494878, at *3

(S.D.N.Y. Sept. 9, 1994) (permitting reopening of deposition only if party could specifically identify areas of inquiry previously foreclosed). To the extent Plaintiff has not identified specific questions that Ms. Maxwell was instructed not to answer she has waived any issue related to the questioning.

II. THE REQUESTED TOPIC AREAS ARE CUMULATIVE, DUPLICATIVE AND NO GOOD CAUSE EXISTS FOR PERMITTING ADDITIONAL DEPOSITION TIME

Plaintiff's proffered "topic areas" that she would like to re-open the deposition to cover – again – makes clear that what she is asking for is additional time – in excess of the almost 12 hours she has already had – to ask questions that have already been answered. This is impermissible under Rule 30(d)(1) which prohibits depositions in excess of 7 hours seeking the type of duplicative and cumulative testimony Plaintiff seeks.

The only testimony cited in the Motion are instances in which Ms. Maxwell had already fully testified on the topic area. First, she cites questions concerning Johanna Sjoberg, a witness who has been deposed in this case. What Plaintiff ignores is that Ms. Maxwell had already been fully examined concerning her knowledge about Ms. Sjoberg and answered every question, with the exception of a single questions regarding adult consensual sexual activity which was answered in the second deposition. *See* Pagliuca Decl., Ex. C at 59:7-63:16; 286:23-293:13; 307:6-312:12 & Ex. D at 77:24 – 78:6 ("Q. Did Mr. Epstein, insofar as you believe, engage in sexual activities with Johanna? A. I would not know. I would say no. Q. Did you engage in sexual activities with Johanna? A. No."). Despite this, leeway was given, and 5 pages of repeated testimony concerning Ms. Sjoberg commenced and was permitted until the duplicative nature of the testimony was simply too much. *See* Pagliuca Decl., Ex. D at 74:2-78:19.

Second, Plaintiff inaccurately complains that Ms. Maxwell refused to answer questions concerning sexual activity involving two women named Annie and Maria Farmer. Motion at 6. Not so. Ms. Maxwell answered questions for fully **13 pages** of her deposition concerning the Farmers. *See* Pagliuca Decl., Ex. D at 95-98 and 103-113. Ms. Maxwell answered **well over 76 questions** relating to Annie and Maria Farmer including who they are, when she met them, whether she ever saw them at Epstein's homes or her own home, whether Epstein ever had sex with them, whether they worked for Epstein, whether they flew on planes together, gave or received massages, participated in any sexual activities with one another, where they lived, the description of their living environments, and whether journalist Vicky Ward ever told Ms. Maxwell that Epstein had engaged in sexual activities. *Id.* This was on top of the questions that Ms. Maxwell had already answered at her **first** deposition that were nearly identical: who are the Farmers, how did you meet them, whether they ever made any allegations of sexual abuse by Epstein, or whether Ms. Maxwell had ever had non-consensual sexual contact with Annie Farmer. Pagliuca Decl., Ex. C at 95:14 -98:10 & 103:19-113:22. In fact, at the first deposition, Ms. Maxwell did not refuse to answer a single question regarding the Farmers. Thus, all of the questions at the second deposition were redundant, cumulative and outside of the Court's Order. The only question that Ms. Maxwell refused to answer was: "What did Vicky Ward tell you about Maria Farmer when she talked to you?" after which she answered another 10 pages of questions that centered around whether Vicky Ward had said specific things regarding the Farmers. Pagliuca Decl., Ex. D at 103-113. Ms. Maxwell has already flatly denied she had any knowledge of the allegations posited by reporter Vicky Ward.

Plaintiff is not permitted to re-depose Ms. Maxwell on issues already covered, or which she had the opportunity to cover, in the first 7-hour deposition, particularly in light of the

additional 4.5 hours permitted in the second deposition and the fact that she answered in the second deposition the only pertinent questions permitted by the Court Order. *See* Fed. R. Civ. P. 30(d)(1) (“the court must allow additional time *consistent with Rule 26(b)(1) and (2)* if needed to fairly examine the deponent”) (emphasis added). Rule 30(d)(1) requires a court to guard against redundant or disproportionate discovery, stating that any additional deposition time must be consistent with Rule 26(b)(1) and (2), prohibiting, among other things, cumulative and duplicative testimony. The duplicative nature of the “topics” requested by Plaintiff is demonstrated by the previously cited testimony. It is compounded by the fact that Ms. Sjoberg has fully testified concerning how she came to work for Epstein, what she did while working for him, and how she was paid. *See* This Response at 20-21, *infra*. The redundancy of the requested testimony (much of which is outside the scope of the Order) prohibits a finding of good cause for reopening – yet again – Ms. Maxwell’s testimony. *See Kleppinger v. Texas Dep’t of Transp.*, 283 F.R.D. 330, 333 (S.D. Tex. 2012) (“a party seeking a court order to extend the duration of the examination must show ‘good cause’ to justify such an order” including showing information is not duplicative and cumulative).

Of course, Ms. Maxwell and her counsel had no desire to subject Ms. Maxwell to a third deposition, thus permitting many questions that far exceeded the scope of the Order. When called on to explain how extraneous questions were proper, Plaintiff’s counsel refused to proffer why certain questions were within the Court’s order leaving Ms. Maxwell’s counsel no option, on a few occasions, to instruct Ms. Maxwell to not answer. Plaintiff’s counsel’s refusal to simply explain how objectionable questions were within the scope of the permitted deposition makes clear that they were not, and should act as a waiver. *See, e.g.,* Pagliuca Decl., Ex. D at 99-101.

III. COUNSEL INSTRUCTED MAXWELL NOT TO ANSWER TO ENFORCE THE COURT'S ORDER AND TO PREVENT HARASSMENT BY PLAINTIFF'S COUNSEL

The only questions to which counsel for Ms. Maxwell instructed her not to answer were those that she had already answered or were outside the Court's Order permitting a re-opening of the deposition. Fed. R. Civ. P. 30(c)(2) (instruction not to answer appropriate "when necessary to ... enforce a limitation ordered by the court"). Plaintiff loosely points to eleven questions in her Motion. She omits parts in which the question had already been answered, and she implies an instruction not to answer where none was given. None of the cited questions merits the re-opening of Ms. Maxwell's deposition for a third bite at the apple.

A. Objected to Question Number 1:

"So how did it happen, Ms. Maxwell, that Joanna, who had been hired to answer phones, ended up giving massages to you and Mr. Epstein."

In Ms. Maxwell's first, 7 hour, deposition she was questioned extensively about her relationship with Ms. Sjoberg. *See Pagliuca Decl. Ex. C at 59-63; 112-113; & 307-309.* Consistent with the Defendant's position at that time, Plaintiff was free to ask, and asked, questions about Ms. Sjoberg with the exception of consensual adult sexual contact. The only instruction to not answer was limited to consensual adult sexual contact, of which there was none. (Although in fact, Ms. Maxwell testified in her first deposition that the massages with Ms. Sjoberg did not involve sex.). *See Pagliuca Decl. Ex. C at 61:14-15.*

In Ms. Maxwell's second, 4.5 hour deposition, she was again questioned extensively about Ms. Sjoberg. The questioning begins on page 74 of the transcript. Plaintiff's counsel asked dozens of questions about Ms. Sjoberg without any instruction to not answer. When the questions became repetitive to the questions asked at the first deposition and strayed outside the

Court's Order counsel for Ms. Maxwell sought guidance from the Court, which was not available.

Notwithstanding that the examination was repetitive, Ms. Maxwell responded to questions, without instruction not to answer, that were within the Court's Order. She testified that she did not have any sexual relationship or contact with Ms. Sjoberg and was unaware of any sexual contact between Mr. Epstein and Ms. Sjoberg. *See* Pagliuca Decl. Ex. D at 77:24-78:6. She also testified about Ms. Sjoberg and massages, both in her first deposition and the second. *See* Pagliuca Decl. Ex. C at 59-63; 112-113; & 307-309 and Ex. D at 74-82:8.

When the question about Ms. Sjoberg answering phones for was asked for the *fourth time*, the instruction not to answer was given. These questions had been asked in the first deposition, could have been asked in greater detail in the first deposition, and were answered in both depositions prior to the instruction not to answer being given: Ms. Sjoberg was hired to answer phones and sometime after that went to massage school and began giving massages. Ms. Maxwell was not sure how the transition occurred but believed "that she went to massage school and became a professional masseuse." *Id.*, at 75:10-11.

B. Objected to Questions Number 2 and 3.

"Did Mr. Epstein pay Johanna for the massages that she gave Mr. Epstein?"
"Do you know how much Mr. Epstein paid Johanna to give massages?"

Plaintiff has selectively and misleadingly provided only a portion of the transcript related to this issue and ignores the fact that Plaintiff, in the first deposition, asked questions on the same topic. Moreover, Ms. Maxwell previously testified that she did not pay Ms. Sjoberg and did not know who paid her. *See* Pagliuca Decl. Ex. C at 59-63; 112-113; & 307-309 and Ex. D at 82:2-7.

C. “Objected” to Question Number 4.

“Do you know if Maria Farmer was ever at Mr. Wexner’s property in Ohio?”

This question is completely outside the Court’s June 20, 2016 Order as it does not relate to Ms. Maxwell, Mr. Epstein, massages, sex, or any property identified in this case. Regardless, the witness was never instructed to not answer the question and did not refuse to answer questions about the Farmers. After the question was posed, counsel for Ms. Maxwell simply asked for an explanation as to how the question was within the Court’s Order. The witness was not instructed not to answer. It appears that after considering the request for a proffer as to how the question was within the Court’s Order, the question was withdrawn and a different question was posed: “Mr. Boies: Let me approach it this way.” ... Did Ms. Ward tell you that?” The questioning about the Farmers continues many pages thereafter. *See Pagliuca Decl., Ex. D at 99-113.*

D. “Objected” to Question Number 5

Without any record support Plaintiff claims that “Defendant’s counsel also stopped a line of questioning in which defendant was asked if she recalled several girls Tony Figueroa brought over to give a ‘massage’ to Epstein.” Plaintiff cites no specific instruction not to answer because one was never given. Ms. Maxwell answered questions about Mr. Figueroa and was questioned extensively regarding lists of names, about which Ms. Maxwell had no knowledge. Plaintiff was not forced to “cease questioning” about any person. The questioning occurred and Ms. Maxwell responded.

E. “Objected” to Question Number 6

“Was there a list that was kept of women or girls who provided massages?”

The “list” was introduced as Exhibit 13 to Ms. Maxwell’s first deposition. Ms. Maxwell was questioned extensively about the “list” and testified, without objection about the list. In her

second deposition, the same Exhibit 13 was introduced and Ms. Maxwell was asked, without objection, questions relating to specific names on Exhibit 13. *See* Pagliuca Decl., Ex. C at 312-334 and Ex. D at 179- 89.

Exhibit 13 was a document prepared by someone other than Ms. Maxwell, was not maintained by Ms. Maxwell and over which Ms. Maxwell had no control. Given the extensive testimony on the subject in both depositions, it was appropriate to instruct the witness to not answer the question. This debate, however is unnecessary because the question was asked again in a slightly different form and answered: Q: “Did you, or insofar as you are aware anyone, maintain a list of females that provided massage services to Mr. Epstein at his residences?” A: “I don’t know anything about a list.” *Id.*, Ex. D at 185:13-20. No follow up questions were asked after this answer.

F. Objected to Question Number 7

“In 2005, were you aware of any effort to destroy records of messages you had taken of women who had called Mr. Epstein in the prior period?”

Ms. Maxwell was previously deposed about documents purportedly seized when Mr. Epstein’s house was searched by the Palm Beach Police Department. *See* Pagliuca Decl., Ex. C at 312-19.

The Court’s June 20, Order did not reopen the deposition to allow for baseless questions about the destruction of evidence in 2005. Alleged destruction of records has nothing to do with any of the 8 areas that the Court addressed. Accordingly, the objection is well founded. Plaintiff’s tortured explanation about how the question fits into the Court’s Order is nonsense.

G. Objection to Question Number 8

“In terms of preparing for this deposition, what documents did you review?”

Ms. Maxwell was instructed to not answer the question as it related to privileged communications between Ms. Maxwell and counsel. Ms. Maxwell was asked if any of the documents refreshed her recollection about any of the events that occurred. Her response was: “No.” A follow up question was asked as to whether counsel provided Ms. Maxwell with any documents and the answer was “One, I believe.”

The communication between Ms. Maxwell and counsel was privileged, did not refresh her recollection, and the question was properly objected to.

H. Objections to Questions 9, 10, and 11.

“Now have you ever engaged in oral sex?”

“Did you ever have oral sex with anyone in any of Mr. Epstein’s five homes that you’ve identified other than Mr. Epstein?”

“Did you, in the 1990s and 2000s, engage in sexual activities other than intercourse with women other than what you have testified already?”

All of these questions were prohibited by the Court’s Order because they were related to unidentified “third-parties who bear no knowledge or relation to the key events, individuals, or locations of this case.”

The question “Now have you ever engaged in oral sex?” is not tied to any person place, event or time. It is clearly out of bounds. Ms. Maxwell did, in fact, answer the question about oral sex with individuals other than Mr. Epstein when the locations were specified, *i.e.*, planes; New York; Palm Beach; New Mexico; Paris; and the Virgin Islands. *See* Pagliuca Decl., Ex. D, Excerpts from July22, 2016 Maxwell Deposition pp. 21-23. (The answer was “no”).

The question: “Did you, in the 1990s and 2000s, engage in sexual activities other than intercourse with women other than what you have testified already?” is also prohibited by the Court’s Order as it is not tied to a person, location, or key event associated with this case.

Federal Rule of Civil Procedure 26(b)(1) provides, in relevant part, that “[p]arties may obtain discovery regarding any matter, not privileged, that is relevant to the claim or defense of any party” Although the scope of discovery is deliberately broad, a Court is not “required to permit plaintiff to engage in a ‘fishing expedition’ in the hope of supporting his claim.” *McGee v. Hayes*, 43 Fed.Appx. 214, 217 (10th Cir. 2002) (unpublished opinion); *see also Tottenham v. Trans World Gaming Corp.*, 2002 WL 1967023, at *2 (S.D.N.Y.2002) (“Discovery, however, is not intended to be a fishing expedition, but rather is meant to allow the parties to flesh out allegations for which they initially have at least a modicum of objective support”) (quotations omitted); *Hardrick v. Legal Services Corp.*, 96 F.R.D. 617, 618 (D.D.C.1983) (courts should, remain concerned about “fishing expeditions, discovery abuse and inordinate expense involved in overbroad and far-ranging discovery requests.”) (quotation omitted). “[B]road discovery is not without limits and the trial court is given wide discretion in balancing the needs and rights of both plaintiff and defendant.” *Gomez v. Martin Marietta Corp.*, 50 F.3d 1511, 1520 (10th Cir.1995) (quotation omitted).

Although relevance in discovery is broader than that required for admissibility at trial, “the object of inquiry must have some evidentiary value before an order to compel disclosure of otherwise inadmissible material will issue.” *Zenith Electronics Corp. v. Exzec, Inc.*, No. 93 C 041, 1998 WL 9181, at *2 (N.D.Ill.1998) (quoting *Piacenti v. Gen. Motors Corp.*, 173 F.R.D. 221, 223 (N.D.Ill.1997)). Courts have also recognized that “[t]he legal tenet that relevancy in

the discovery context is broader than in the context of admissibility should not be misapplied so as to allow fishing expeditions in discovery." *Id.* (quotation omitted).

Under Rule 26(c) of the Federal Rules of Civil Procedure any party may move the court, for good cause shown, for a protective order regarding pretrial discovery “which justice requires to protect a party or person from annoyance, embarrassment, oppression or undue burden or expense.” Fed. R. Civ. P. 26(c). “Although the Rule contains no specific reference to privacy or to other rights or interests that may be implicated, such matters are implicit in the broad purpose and language of the Rule.” *Seattle Times Company v. Rhinehart*, 467 U.S. 20, 35 (1984).

It is important to consider, again, that Ms. Maxwell is the defendant in this action. She has not put her private affairs at issue. She simply denied that she assisted Jeffrey Epstein in the sexual trafficking of the Plaintiff. It is also important to recognize that Ms. Maxwell is not Mr. Epstein and Mr. Epstein’s alleged conduct after Plaintiff left the country is not an issue in this defamation case. The Plaintiff has no personal knowledge of any of Mr. Epstein’s activities after 2002. Accordingly, any statements by Plaintiff about Mr. Epstein’s activities occurring after 2002 are her opinions, not facts that are subject to any defamation claim.

I. THE PURPORTED “FACTUAL BACKGROUND” CITED BY PLAINTIFF IS NOT RELEVANT TO THE ISSUES IN THE CASE OR THIS MOTION

As Carl Sandburg famously said, “If the facts are against you, argue the law. If the law is against you, argue the facts. If the law and the facts are against you, pound the table and yell like hell.” In this case, rather than pound the table, Plaintiff tries to distract from the issues at hand – whether Ms. Maxwell fully answered all questions posed – by pointing to selective misleading quotes from various other witnesses who have been deposed in this case. When viewed in their entirety, those witnesses neither support Plaintiff’s single claim for defamation nor her claim for

relief in this Motion. In direct contradiction to Plaintiff's fabricated story, the witnesses actually testified as follows:

Johanna Sjoberg worked as a masseuse for Jeffrey Epstein for 5 years from 2001-2006, while she was aged 21-26, including 1 ½ years that Plaintiff claims she was his "sex slave". As to that experience, Ms. Sjoberg testified:

- She never saw underage girls with Jeffrey Epstein or Ms. Maxwell and was "surprised" by the allegations of underage girls. Pagliuca Decl., Ex. E at 102. She never witnessed anyone underage in the presence of Epstein and Maxwell. *Id.* at 29. She only witnessed masseuses who were her age or older and they wore "normal" clothes. *Id.* at 31-32.
- She never was asked by Epstein or Maxwell to give sexual massages to any of their friends or any famous people and the massages she gave Epstein's friends were purely non-sexual. *Id.* at 112-116.
- She never gave any type of sexual massages to Ghislaine Maxwell. Ms. Maxwell never asked her to get naked during a massage, never asked for any sexual contact with her, and she remained appropriately draped during any massages. Ms. Maxwell was never present when she gave massages to Mr. Epstein. *Id.* at 95-97.
- Plaintiff appeared to Ms. Sjoberg to be some type of assistant who possibly also gave massages to Epstein. *Id.* at 19. She never seemed traumatized, she never reported to her any inappropriate requests or contact by Epstein or Maxwell, never said she had been sexually trafficked, she freely came and went. *Id.* at 113-16. In the only massage by Plaintiff of Epstein that Ms. Sjoberg observed, Plaintiff was fully clothed, on a beach, and it was non-sexual. *Id.* at 27. Ms. Sjoberg never saw Plaintiff in the presence of any famous people, apart from Prince Andrew and she did not observe anyone asking Plaintiff to do anything sexual, nor did Plaintiff report to her that anything sexual had occurred, even though Ms. Sjoberg inquired. *Id.* at 85, 87, 113 & 120. Plaintiff disappeared from the Epstein home about June 2001 when attempts to contact her led to a seemingly drugged-out boyfriend who could not explain her whereabouts. *Id.* at 92.
- Despite hundreds of times in the Epstein home, Ms. Sjoberg only saw a few photos of adult women in topless poses in the bathroom of Epstein, there was no child pornography in the homes, and she does not recall any naked photos of Plaintiff. *Id.* at 25, 29, 42, 103-106.
- Ms. Sjoberg observed no orgies or sexual contact occur in the open at Epstein's homes or on his planes. *Id.* at 94, 102.

- Ms. Maxwell asked her if she knew any friends who might be interested in being masseuses, but the one she brought was an adult; Ms. Maxwell never asked for “underage” participants. *Id.* at 141, 152-53.
- Whatever sexual contact occurred between Ms. Sjoberg and Mr. Epstein was between “consenting adults,” as she told the police in 2006, and she only was “expected” to have sexual intercourse in 2005, after she had worked for him for 4 years. *Id.* at 101, 147.
- Ms. Sjoberg respects Ms. Maxwell and is impressed by her talents. *Id.* at 55, 94-95, 97-98, 147 She have a lot of fun the last time they hung out in 2006. *Id.* at 98.

Joe Recarey, the lead investigator of Jeffrey Epstein from the Palm Beach County Police Department, testified at his deposition, that (in contrast to Plaintiff’s claims):

- He and other investigators interviewed approximately 30-33 females in connection with the case and identified approximately 17 victims. Pagliuca Decl., Ex. F at 179, 334.
- Ms. Maxwell was never a suspect in their investigation, was not a target of the grand jury investigation, nothing of Ms. Maxwell’s was seized from the home during execution of the search warrant, and Ms. Maxwell was never observed at the Epstein home during the police surveillance. *Id.* at 177, 211-12,214-16, 257.
- None of the victims identified Ms. Maxwell as having “recruited” them to come give massages to Epstein. *Id.* at 180-82, 191-93, 195.
- None identified Ms. Maxwell as even being at the house when they were there, or paying them, or instructing them on what to wear or how to act, or ever of having spoken to them. *Id.*
- None were ever sexually trafficked to other men; Jeffrey Epstein was the only person with whom they had any sexual contact. *Id.* at 300-301.
- None were ever asked to spend the night with Epstein, or travel with them. *Id.*
- He did not observe any child pornography or any photos of naked women in the home when he went to help install cameras to catch a thief in Mr. Epstein’s home in 2002 (who turned out to be butler Juan Alessi). *Id.* at 288-90.

Juan Alessi. He served as the butler for approximately 10 year period at Mr. Epstein’s home in Palm Beach. He testified that:

- The majority of masseuses that came to the house were over the age of 20. Pagliuca Decl., Ex. G at 200.
- Mr. Epstein and Ms. Maxwell found the massage therapists from the high-end spas nearby, including the Breakers, Boca Raton and Mar-a-Lago, as Mr. Alessi confirmed when he called them at their jobs to arrange home visits. *Id.* at 187-88.
- The massage therapists were paid by check. *Id.* at 166.
- Plaintiff was working at one of these spas when she was hired, wearing an old-fashioned nurse's type uniform. *Id.* at 174.
- Contrary to Plaintiff's main story, she did not go upstairs with Mr. Epstein the first time she came over and he did not drive her home. *Id.* at 192.

Tony Figueroa – Plaintiff's live-in boyfriend during the time that she worked for Mr.

Epstein, testified that:

- He and Plaintiff used a substantial quantity of drugs during this time period which affected both of their memories. Pagliuca Decl., Ex. H at 129-32 (describing their daily use of "weed," their joint regular use of "Xanax," as well as use of cocaine, Xanax, Ecstasy and acid).
- Jeffrey Epstein is the one who called him and asked him to bring other females to give massages. *Id.* at 104-107. In particular, Mr. Figueroa *denied* that Ms. Maxwell ever asked him to bring a girl to Jeffrey:

Q: Did Jeffrey call you directly about getting more girls?

A: Yes.

Q: On the phone?

A: uh-huh (affirmative)

Q: What did he say?

A: He was just asking me if I had any other girls that wanted to come work...

Q: And did he pay – he paid you personally?

A: Yeah. He handed me \$200 for every girl that I walked in that door, whether they did stuff with him or not.

Q: In cash?

A: Cash.

Q: Did you ever get paid by Ms. Maxwell for that?

A: No.

Q: Did you ever bring a girl to Ms. Maxwell?

A: No.

Q: Did Ms. Maxwell ever call you and ask you to bring a girl to her?

A: No.

Q: Did Ms. Maxwell ever call you and ask you to bring a girl to Jeffrey?

A: No.

Id. at 106-07.

- He did not have any discussions with these females (who were adult) about what was entailed with the job other than massages. *Id. at 104-105.*
- Later in his testimony, upon leading questions from Mr. Edwards, Mr. Figueroa committed a complete about-face:

Q: Would Ghislaine Maxwell call you?

A: I think she might have actually called me once or twice. I'm not positive, but I'm pretty sure she did....

Q: ...What did you say? What did she say?

A: She would just ask me if I had anybody lined up, so....for Jeffrey.

- Mr. Figueroa testified that he was arrested for grand theft the same night that he dropped Plaintiff off to go to Thailand, he served time, and only recently had his rights restored. *Id. at 67-69.*

Rinaldo Rizzo. Mr. Rizzo was a butler for Mr. Glenn and Dr. Eva Dubin at their home in upstate New York. In addition to his history of litigation against the Dubins and his admitted hope to receive compensation from his testimony, his deposition is so palpably incredible as to be potentially sanctionable. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Pagliuca Decl., Ex. I at 11. In any event, none of Mr. Rizzo's testimony related to Ms. Maxwell's participation in massages, sex with underage minors, or sex with adults, and thus is further irrelevant to the issues presented by the Motion.

CONCLUSION

Because Ms. Maxwell fully answered all questions within the Court's Order (and many that were not) at her continued deposition, she respectfully requests the Court deny Plaintiff's

Motion to Enforce the Court's Order and Direct Defendant to Answer Deposition Questions Filed Under Seal. Further, because Plaintiff brought this Motion without a valid basis to assert that she refused to answer any question that was (a) within this Court's Order and (b) not already responded to either at her first deposition or during this deposition, Ms. Maxwell requests that the fees and costs associated with defending this Motion be imposed on Plaintiff, her counsel or both.

Respectfully submitted,

/s/ Jeffrey S. Pagliuca

Laura A. Menninger (LM-1374)

Jeffrey S. Pagliuca (*pro hac vice*)

HADDON, MORGAN AND FOREMAN, P.C.

150 East 10th Avenue

Denver, CO 80203

Phone: 303.831.7364

Fax: 303.832.2628

lmenninger@hmflaw.com

Attorneys for Ghislaine Maxwell

CERTIFICATE OF SERVICE

I certify that on August 8, 2016, I electronically served *Response in Opposition to Plaintiff's Motion to Enforce the Court's Order and Direct Defendant to Answer Deposition Questions Filed Under Seal* via ECF on the following:

Sigrid S. McCawley
Meredith Schultz
BOIES, SCHILLER & FLEXNER, LLP
401 East Las Olas Boulevard, Ste. 1200
Ft. Lauderdale, FL 33301
smccawley@bsfllp.com
mschultz@bsfllp.com

Bradley J. Edwards
FARMER, JAFFE, WEISSING, EDWARDS,
FISTOS & LEHRMAN, P.L.
425 North Andrews Ave., Ste. 2
Ft. Lauderdale, FL 33301
brad@pathtojustice.com

Paul G. Cassell
383 S. University Street
Salt Lake City, UT 84112
cassellp@law.utah.edu

J. Stanley Pottinger
49 Twin Lakes Rd.
South Salem, NY 10590
StanPottinger@aol.com

/s/ Nicole Simmons

Nicole Simmons

EXHIBIT A

GIUFFRE

VS.

MAXWELL

Deposition

VIRGINIA GIUFFRE

05/03/2016

Agren Blando Court Reporting & Video, Inc.

216 16th Street, Suite 600

Denver Colorado, 80202

303-296-0017

Page 25

1 **January 19th, 2015?**

2 A At the very top of the page it says

3 January 21st, 2015.

4 **Q The date it was filed. Is there a date**

5 **just above the signature block?**

6 A Oh, yes, sorry. Yes, there is.

7 **Q And what date -- what date was that?**

8 A The 19th day of January, 2015.

9 **Q Okay. And this document is something that**

10 **you believe contains the truth, correct?**

11 A To the best of my knowledge at the time,

12 yes.

13 **Q All right. Did something change between**

14 **the time then and today that makes you believe that**

15 **it's not all accurate?**

16 A Well, as you can see, in line 4 on page 1,

17 I wasn't aware of my dates. I was just doing the

18 best to guesstimate when I actually met them.

19 Since then I've been able to find out that

20 through my Mar-a-Lago records that it was actually

21 the summer of 2000, not the summer of 1999.

22 **Q Oh, I'm sorry. Are you back on page 1?**

23 A On the first page.

24 **Q Okay.**

25 A Yes.

Page 26

1 **Q And you're talking about line 4?**

2 A Line 4.

3 **Q Paragraph 4 or line 4?**

4 A Oh, sorry. Number 4, the paragraph

5 number 4.

6 **Q Okay. And what part of paragraph 4 do you**

7 **now believe to be untrue?**

8 A In approximately --

9 MR. EDWARDS: Object to the form.

10 You can answer.

11 A In approximately 1999 when I was 15 years

12 old I met Ghislaine Maxwell.

13 **Q (BY MS. MENNINGER) Okay.**

14 A I now know that it was 2000, that I was 16

15 years old when I met Ghislaine Maxwell.

16 **Q So when you signed this document under**

17 **penalty of perjury stating that it was true, you no**

18 **longer believe that to be true, correct?**

19 A It was an honest mistake. We had no idea

20 how to pinpoint without any kind of records or dates

21 or anything like that. I was just going back

22 chronologically through time. And that's the best

23 time that I thought it was. And now I know the

24 facts, so it's good to know.

25 **Q So you now believe that a document you**

Page 27

1 **filed under oath is no longer true, correct?**

2 MR. EDWARDS: Object to the form.

3 A I wouldn't say that it wasn't true. I was

4 just unaware of the times and the dates.

5 **Q (BY MS. MENNINGER) Again, is there more**

6 **than one truth, Ms. Roberts?**

7 A No, there's no more than one truth.

8 **Q All right. So a document in which you**

9 **swore that you were 15 years old when you met**

10 **Ms. Ghislaine Maxwell is an untrue statement,**

11 **correct?**

12 MR. EDWARDS: Object to the form.

13 A It's not that it's an untrue statement.

14 It was a mistake. So it wasn't intentionally trying

15 to say something that wasn't true. It was to my best

16 knowledge that I thought it was 1999. And when I got

17 my records from Mar-a-Lago I was able to find out

18 that it was 2000. And this was entered before I

19 found out the actual dates that I did work at

20 Mar-a-Lago.

21 **Q (BY MS. MENNINGER) Okay. So a document**

22 **that you filed under oath --**

23 A Um-hum.

24 **Q -- is now, you believe to be untrue,**

25 **correct?**

Page 28

1 MR. EDWARDS: Objection. Asked and

2 answered.

3 **Q (BY MS. MENNINGER) You may answer.**

4 MR. EDWARDS: Answer again.

5 A Again, I wouldn't say it's untrue. Untrue

6 would mean that I would have lied. And I didn't lie.

7 This was my best knowledge at the time. And I did my

8 very best to try to pinpoint time periods going back

9 such a long time ago.

10 It wasn't until I found the facts that I

11 worked at Mar-a-Lago in 2000 that I was able to

12 figure that out.

13 **Q (BY MS. MENNINGER) And approximately when**

14 **did you learn those facts about the dates you worked**

15 **at Mar-a-Lago?**

16 A I would say it was mid-2015.

17 **Q Mid-2015 is the first time you became**

18 **aware of the dates --**

19 A I don't know the exact --

20 **Q If you could just let me finish.**

21 A I'm sorry.

22 **Q That's all right. Approximately mid-2015**

23 **when you learned the true dates that you had worked**

24 **at Mar-a-Lago?**

25 A That's correct. Sorry.

Page 217

1 please.

2 **Q (BY MS. MENNINGER) Do you recall seeing a**

3 **press article in which Sharon Churcher reported that**

4 **you were on a helicopter with Bill Clinton and**

5 **Ghislaine Maxwell as the pilot?**

6 MR. EDWARDS: Again, I'll let you answer

7 the question once she's looking at the document that

8 you're being asked about.

9 MS. MENNINGER: You're not letting her

10 answer a question about whether she recalls a

11 particular press statement?

12 MR. EDWARDS: I will let her answer every

13 question about the press statement as long as she

14 sees the press statement. I'm okay with that. She

15 can answer all of them.

16 MS. MENNINGER: No, there is a rule of

17 civil procedure that allows you to direct a witness

18 not to answer a question when there's a claim of

19 privilege.

20 What privilege are you claiming to direct

21 her not to answer this question?

22 MR. EDWARDS: I thought that you wanted

23 accurate answers from this witness. If the --

24 MS. MENNINGER: I asked her if she

25 recalled something --

Page 218

1 MR. EDWARDS: If the sole purpose is to

2 just to harass her --

3 MS. MENNINGER: I asked her if she

4 recalled something --

5 MR. EDWARDS: Then that's just not going

6 to be what's happening today.

7 **Q (BY MS. MENNINGER) All right. So you're**

8 **refusing to answer a question about whether you**

9 **recall a particular press statement --**

10 MR. EDWARDS: She's --

11 **Q (BY MS. MENNINGER) -- is that true?**

12 MR. EDWARDS: She is not refusing to

13 answer any questions. She --

14 A I'm not refusing to answer. I just want

15 to see the article you're talking about so I can be

16 clear in my statement.

17 **Q (BY MS. MENNINGER) Do you recall seeing a**

18 **press article written by Sharon Churcher reporting**

19 **that you flew on a helicopter with Bill Clinton and**

20 **Ghislaine Maxwell as the pilot?**

21 A No, I do not recall reading a press

22 article saying that I was on a helicopter with Bill

23 Clinton as Ghislaine is the pilot.

24 **Q Do you recall telling Sharon Churcher that**

25 **you had conversations with Bill Clinton regarding him**

Page 219

1 **flying on a helicopter with Ghislaine Maxwell?**

2 A I believe that it was taken out of

3 context. Ghislaine told me that she flew Bill

4 Clinton in. And Ghislaine likes to talk a lot of

5 stuff that sounds fantastical. And whether it's true

6 or not, that is what I do recall telling Sharon

7 Churcher.

8 **Q So you told Sharon Churcher that Ghislaine**

9 **Maxwell is the one who told you that she flew Bill**

10 **Clinton in the helicopter?**

11 A I told Sharon Churcher that Ghislaine flew

12 Bill Clinton onto the island, based upon what

13 Ghislaine had told me.

14 **Q Not based upon what Bill Clinton had told**

15 **you, correct?**

16 A Correct.

17 **Q Did you ever ask Sharon Churcher to**

18 **correct anything that was printed under her name,**

19 **concerning your stories to Sharon Churcher?**

20 A I wasn't given those stories to read

21 before they were printed.

22 **Q After they were printed did you read them?**

23 A I tried to stay away from them. They were

24 very hard. You have to understand it was a very hard

25 time for me and my husband to have to have this

Page 220

1 public -- we didn't think it was going to be this

2 publicly announced and that big. So we turned off

3 the news and we stopped reading so many things.

4 **Q You didn't read the articles about your**

5 **stories to Sharon Churcher --**

6 A I've read some articles --

7 **Q Let me just finish. You did not read the**

8 **articles published by Sharon Churcher about your**

9 **stories to Sharon Churcher?**

10 A I have read some articles about what

11 Sharon Churcher wrote. And a lot of the stuff that

12 she writes she takes things from my own mouth and

13 changes them into her own words as journalists do.

14 And I never came back to her and told her

15 to correct anything. What was done was done. There

16 was nothing else I can do.

17 **Q So even if she printed something that were**

18 **untrue you didn't ask her to correct it, correct?**

19 A There was things that she printed that

20 really pissed me off, but there was nothing I could

21 do about it. It's already out there.

22 **Q She printed things that were untrue,**

23 **correct?**

24 MR. EDWARDS: Objection to the form.

25 Mischaracterization.

Page 221

1 A I wouldn't say that they were untrue. I
 2 would just say that she printed them as journalists
 3 take your words and turn them into something else.

4 **Q (BY MS. MENNINGER) She got it wrong?**
 5 MR. EDWARDS: Object to the form.
 6 Mischaracterization.

7 A In some ways, yes.

8 **Q (BY MS. MENNINGER) Did she print things**
 9 **in her articles that you did not say to her?**
 10 MR. EDWARDS: I object and ask that the
 11 witness be given the opportunity to see the document
 12 so that she can review it and answer that question
 13 accurately. Otherwise she's unable to answer the
 14 question. I'm not going to allow her to answer.

15 MS. MENNINGER: You know the civil rules
 16 tell you not to suggest answers to your client.

17 **Q (BY MS. MENNINGER) And you understand**
 18 **your lawyer is now directing you to not all of a**
 19 **sudden remember what your answer is. That's what**
 20 **he's suggesting that you say. So you're not supposed**
 21 **to listen to him suggest that to you. You're**
 22 **supposed to tell me from your memory.**
 23 MR. EDWARDS: That is not what I'm --

24 **Q (BY MS. MENNINGER) Did you --**
 25 MR. EDWARDS: That's not what I'm doing.

Page 222

1 You don't get to just talk over me and
 2 tell my client when not to listen to me. All you
 3 have to do to get answers is show her the document
 4 you're talking about, and I'll let her answer every
 5 question. I don't know why we're so scared of the
 6 actual documents.

7 MS. MENNINGER: I don't know why you're
 8 scared of your client's recollection, Mr. Edwards.
 9 But anyway --

10 MR. EDWARDS: Why would you do this to
 11 her?

12 **Q (BY MS. MENNINGER) Did Sharon Churcher**
 13 **print things that you did not say?**
 14 MR. EDWARDS: I'm going to instruct my
 15 client not to answer unless you give her what it is
 16 that you're talking about that was printed. And she
 17 will tell you the answer, the accurate answer to your
 18 question. Just without the document to refresh her
 19 recollection and see it, she's not going to answer
 20 the question.

21 **Q (BY MS. MENNINGER) Did Sharon Churcher**
 22 **print things that you did not say?**
 23 MR. EDWARDS: Same objection. Same
 24 instruction not to answer.
 25 I think I've made a very clear record as

Page 223

1 to why I want my client to answer all of these
 2 questions, but I want her to have the fair
 3 opportunity to see this document.

4 **Q (BY MS. MENNINGER) Did Sharon Churcher**
 5 **print things that you felt were inaccurate?**
 6 MR. EDWARDS: Same objection. Same
 7 instruction. If she sees the document, she's going
 8 to answer every one of these questions.

9 **Q (BY MS. MENNINGER) Did any other reporter**
 10 **print statements that you believe are inaccurate?**
 11 MR. EDWARDS: Same objection. Same
 12 instruction.

13 **Q (BY MS. MENNINGER) Did any reporter print**
 14 **statements about Ghislaine Maxwell that were**
 15 **inaccurate?**
 16 MR. EDWARDS: Same objection. Same
 17 instruction.

18 This is harassing. This is harassing a
 19 sexual abuse victim. And all I'm asking is for
 20 fairness, that we just let her see the document so
 21 she can answer this.

22 MS. MENNINGER: Mr. Edwards, please stop
 23 saying anything other than an objection, what the
 24 basis is, or instructing your client not to answer.
 25 MR. EDWARDS: I will do that.

Page 224

1 MS. MENNINGER: That's what the Federal
 2 Rules of Civil Procedure provide.

3 MR. EDWARDS: I hear you. They also
 4 provide for fairness and civility. And all I'm
 5 asking, very calmly, is for her to see this.

6 MS. MENNINGER: Mr. Edwards, this is not
 7 your deposition. I'm asking your client what she
 8 remembers. If she doesn't want to talk about what
 9 she remembers, then let her not answer. But you
 10 cannot instruct her not to answer unless there's a
 11 privilege.

12 What privilege --

13 MR. EDWARDS: I am instructing her not to
 14 answer.

15 **Q (BY MS. MENNINGER) All right. You are**
 16 **refusing to answer questions about whether statements**
 17 **to the press about Ghislaine Maxwell attributed to**
 18 **you were inaccurate?**
 19 MR. EDWARDS: She's not refusing not to
 20 answer.

21 A You are refusing to show me these
 22 documents so I could answer properly. I would give
 23 you an answer if you were to show me some documents.

24 **Q (BY MS. MENNINGER) You can't say without**
 25 **looking at a document whether the press attributed to**

Page 225

1 **you is accurate or inaccurate?**
 2 A Please show me the document.
 3 **Q You can't say from the top of your head**
 4 **whether any inaccurate statement has been attributed**
 5 **to you in the press?**
 6 A Please show me a document and I will tell
 7 you.
 8 **Q Are you refusing to answer my questions**
 9 **about your knowledge of whether inaccurate statements**
 10 **have been attributed to you in the press?**
 11 A Are you refusing to give me the documents
 12 to look at?
 13 **Q Are you refusing to answer the question?**
 14 A I am refusing to answer the question based
 15 upon the fact that you are not being fair enough to
 16 let me see the document in order to give you an
 17 honest answer.
 18 **Q Ms. Giuffre --**
 19 A Yes.
 20 **Q -- we are talking about press that has**
 21 **been published on the Internet, correct?**
 22 A Yes.
 23 **Q Do you have access to the Internet?**
 24 A Yes.
 25 **Q Have you looked on the Internet and read**

Page 226

1 **articles that attribute statements to you about**
 2 **Ghislaine Maxwell?**
 3 A Yes.
 4 **Q Do you know any statement that has been**
 5 **attributed to you in a press article on the Internet**
 6 **about Ghislaine Maxwell that is untrue?**
 7 MR. EDWARDS: Same objection. Same
 8 instruction.
 9 A Please show me a specific document.
 10 **Q (BY MS. MENNINGER) Do you know of any**
 11 **such statement about Ghislaine Maxwell attributed to**
 12 **you by the press that is inaccurate?**
 13 A If you could please show me a specific
 14 document.
 15 **Q Tell me what Sharon Churcher asked you to**
 16 **write for her.**
 17 A Any knowledge that I had about my time
 18 with Prince Andrew.
 19 **Q And did you write it?**
 20 A Um-hum.
 21 **Q What did you write it in or on?**
 22 A Paper.
 23 **Q What kind of paper?**
 24 A Lined paper.
 25 **Q Was it in a book or single sheets?**

Page 227

1 A Single sheets.
 2 **Q And did you write a long document or a**
 3 **short document? What was it?**
 4 A I can't recall how long the document was,
 5 but I would say it would be a few pages.
 6 **Q And other than asking you to write**
 7 **whatever you remember about Prince Andrew, did she**
 8 **give you any other directions about what you should**
 9 **write?**
 10 A She was interested in two things, really.
 11 How Epstein got away with so many counts of child
 12 trafficking for sex and how Prince Andrew was
 13 involved in it. Those were her two main inquiries.
 14 **Q What did she ask you to write?**
 15 A She asked me to write about Prince Andrew.
 16 **Q Did she tell you to put it in your own**
 17 **handwriting?**
 18 A No, she just asked me to write down what I
 19 can remember.
 20 **Q Did you give her everything that you**
 21 **wrote?**
 22 A Did I give her the whole entire pages that
 23 I wrote?
 24 **Q Yes.**
 25 A Yeah, I wrote pages for her specifically.

Page 228

1 **Q In your own handwriting?**
 2 A In my own handwriting.
 3 **Q And what you wrote, was that true?**
 4 A Yes.
 5 **Q And did you get paid for those pieces of**
 6 **paper?**
 7 A Not for the papers, I don't believe.
 8 **Q Okay. Have you gotten paid when they've**
 9 **been reprinted?**
 10 A No.
 11 **Q Have you negotiated any deal with Radar**
 12 **Online?**
 13 A No.
 14 **Q Have you negotiated any deal with Sharon**
 15 **Churcher for the purpose of publishing those pieces**
 16 **of paper?**
 17 A Not those pieces of paper.
 18 **Q When did you write those pieces of paper?**
 19 MR. EDWARDS: Object to the form.
 20 A A week before she came out.
 21 **Q (BY MS. MENNINGER) And when did you give**
 22 **them to her?**
 23 A When she came out.
 24 **Q When was that?**
 25 A Sometime, I believe, in early 2011.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

VIRGINIA L. GIUFFRE,

Plaintiff,

Case No.:

-against-

15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendants.

- - - - - x

CONFIDENTIAL

Videotaped deposition of GHISLAINE
MAXWELL, taken pursuant to subpoena, was
held at the law offices of BOIES
SCHILLER & FLEXNER, 575 Lexington
Avenue, New York, New York, commencing
April 22, 2016, 9:04 a.m., on the above
date, before Leslie Fagin, a Court
Reporter and Notary Public in the State
of New York.

- - -

MAGNA LEGAL SERVICES
1200 Avenue of the Americas
New York, New York 10026



Page 18

1 G Maxwell - Confidential
 2 meet Mr. Epstein?
 3 MR. PAGLIUCA: Object to the form
 4 and foundation.
 5 Q. You can answer.
 6 A. I just explained.
 7 A. I spent the entire time talking to
 8 Virginia's mother outside the house so the
 9 answer to the question is no.
 10 Q. No, did you not walk her up and
 11 introduce her to Mr. Epstein?
 12 A. I just said no.
 13 Q. Did you participate in a massage
 14 this first time when she first came to the
 15 home and you were speaking with her mother,
 16 she was in the home, is that correct, you
 17 brought her into the home?
 18 MR. PAGLIUCA: Object to the form
 19 and foundation.
 20 A. I will repeat again, I was standing
 21 outside with her mother so very difficult for
 22 me to do anything else at that time so no, I
 23 did not take her upstairs.
 24 Q. Did you participate --
 25 A. Virginia lied 100 percent about

Page 19

1 G Maxwell - Confidential
 2 absolutely everything that took place in that
 3 first meeting. She has lied repeatedly,
 4 often and is just an awful fantasist. So
 5 very difficult for anything to take place
 6 that she repeated because I was with her
 7 mother the entire time.
 8 Q. So did you have -- did you give a
 9 massage with Virginia Roberts and Mr. Epstein
 10 during the first time Virginia Roberts was at
 11 the West Palm Beach house?
 12 MR. PAGLIUCA: Object to the form
 13 and foundation.
 14 Q. Yes or no?
 15 A. No.
 16 Q. Have you ever given a massage with
 17 Virginia Roberts in the room and Jeffrey
 18 Epstein?
 19 MR. PAGLIUCA: Object to the form
 20 and foundation.
 21 A. No.
 22 Q. Have you ever given Jeffrey Epstein
 23 a massage?
 24 MR. PAGLIUCA: Object to the form,
 25 foundation. And I'm going to instruct

Page 20

1 G Maxwell - Confidential
 2 you not to answer that question. I
 3 don't have any problem with you asking
 4 questions about what the subject matter
 5 of this lawsuit is, which would be, as
 6 you've termed it, sexual trafficking of
 7 Ms. Roberts.
 8 To the extent you are asking for
 9 information relating to any consensual
 10 adult interaction between my client and
 11 Mr. Epstein, I'm going to instruct her
 12 not to answer because it's not part of
 13 this litigation and it is her private
 14 confidential information, not subject to
 15 this deposition.
 16 MS. McCAWLEY: You can instruct her
 17 not to answer. That is your right. But
 18 I will bring her back for another
 19 deposition because it is part of the
 20 subject matter of this litigation so she
 21 should be answering these questions.
 22 This is civil litigation, deposition and
 23 she should be responsible for answering
 24 these questions.
 25 MR. PAGLIUCA: I disagree and you

Page 21

1 G Maxwell - Confidential
 2 understand the bounds that I put on it.
 3 MS. McCAWLEY: No, I don't. I will
 4 continue to ask my questions and you can
 5 continue to make your objections.
 6 Q. Did you ever participate from the
 7 time period of 1992 to 2009, did you ever
 8 participate in a massage with Jeffrey Epstein
 9 and another female?
 10 MR. PAGLIUCA: Objection. Do not
 11 answer that question. Again, to the
 12 extent you are asking for some sort of
 13 illegal activity as you've construed in
 14 connection with this case I don't have
 15 any problem with you asking that
 16 question. To the extent these questions
 17 involve consensual acts between adults,
 18 frankly, they're none of your business
 19 and I will instruct the witness not to
 20 answer.
 21 MS. McCAWLEY: This case involves
 22 sexual trafficking, sexual abuse,
 23 questions about her having interactions
 24 with other females is relevant to this
 25 case. She needs to answer these

Page 22

1 G Maxwell - Confidential
 2 questions.
 3 MR. PAGLIUCA: I'm instructing her
 4 not to answer.
 5 MS. McCAWLEY: Then we will be back
 6 here again.
 7 Q. Have you ever given a massage to
 8 Mr. Epstein with a female that was under the
 9 age of 18?
 10 A. Can you repeat the question?
 11 Q. Yes. Have you ever given a massage
 12 to Mr. Epstein with a female that was under
 13 the age of 18?
 14 A. No.
 15 Q. Have you ever observed Mr. Epstein
 16 having a massage given by an individual, a
 17 female, who was under the age of 18?
 18 A. No.
 19 Q. Have you ever observed females
 20 under the age of 18 in the presence of
 21 Jeffrey Epstein at his home?
 22 MR. PAGLIUCA: Object to the form
 23 and foundation.
 24 A. Again, I have friends that have
 25 children --

Page 23

1 G Maxwell - Confidential
 2 Q. I'm not talking about friends. I'm
 3 talking about individuals --
 4 MR. PAGLIUCA: I'm going to object
 5 to you interrupting the witness who was
 6 answering your question. The question
 7 was, have you ever seen anyone, female
 8 under the age of 18 at the house and
 9 that's the question she was answering.
 10 If you want to strike that question and
 11 ask another question, feel free, but let
 12 the witness respond, please.
 13 MS. McCAWLEY: I will do that.
 14 Q. Have you ever observed a female
 15 under the age of 18 at Jeffrey Epstein's home
 16 that was not a friend, a child -- one of your
 17 friend's children?
 18 A. Again, I can't testify to that
 19 because I have no idea what you are talking
 20 about.
 21 Q. You have no idea what I'm talking
 22 about in the sense you never observed a
 23 female under the age of 18 at Jeffrey
 24 Epstein's home that was not one of your
 25 friend's children, is that correct?

Page 24

1 G Maxwell - Confidential
 2 MR. PAGLIUCA: Object to the form
 3 and foundation.
 4 A. How would I possibly know how
 5 someone is when they are at his house. You
 6 are asking me to do that. I cannot possibly
 7 testify to that. As far as I'm concerned,
 8 everyone who came to his house was an adult
 9 professional person.
 10 Q. Are you familiar with the police
 11 report that was issued in respect to the
 12 investigation in this matter?
 13 MR. PAGLIUCA: Object to the form
 14 and foundation.
 15 Q. Are you familiar with the police
 16 report that was used in this matter, the
 17 investigation of Jeffrey Epstein, has been
 18 produced as a document in this matter?
 19 A. I have seen a police report.
 20 (Maxwell Exhibit 1, police report,
 21 marked for identification.)
 22 Q. The police report that you have in
 23 front of you, can you turn to page 28 of that
 24 report, the numbers are on the top right-hand
 25 corner.

Page 25

1 G Maxwell - Confidential
 2 You will see some redactions in
 3 this report, Ms. Maxwell, the redacted
 4 information is redacted because it reveals
 5 the name of a minor, someone who is under the
 6 age of 18.
 7 On page 28, in the third paragraph,
 8 about halfway down, it says, Roberts stated
 9 she performed the massage naked. At the
 10 conclusion of this massage, Epstein paid
 11 RobSON \$200 for the massage. He explained, I
 12 know you are not comfortable put I will pay
 13 you if you bring some girls. He told her the
 14 younger the better. Robson stated once tried
 15 to bring a 23 year old to Epstein and he
 16 stated the female was too old.
 17 Have you heard Mr. Epstein use the
 18 phrase the younger the better?
 19 A. I have no recollection of hearing
 20 that.
 21 Q. Have you used the phrase in talking
 22 to Ms. Roberts and asking her to recruit
 23 females for Mr. Epstein, the younger the
 24 better?
 25 MR. PAGLIUCA: Object to the form

Page 38

1 G Maxwell - Confidential
 2 Q. Was she under 18 when you first met
 3 her?
 4 A. I have no idea how old she was when
 5 I first met her.
 6 Q. Did she look like a child when you
 7 first met her?
 8 A. I don't remember what she looked
 9 like at the time she was in the house.
 10 Q. How many years have you known her?
 11 A. I can only recall the last time I
 12 saw her.
 13 Q. When was the first time you met
 14 her?
 15 A. Again, I just told you, I don't
 16 recall the first time I met her.
 17 Q. Did [REDACTED] travel with you
 18 on Jeffrey's planes?
 19 A. I wouldn't remember if [REDACTED] was on
 20 the plane or not.
 21 Q. Did you ever have sex with [REDACTED]
 22 [REDACTED]?
 23 A. No.
 24 Q. Did you ever observe Jeffrey having
 25 sex with [REDACTED]?

Page 39

1 G Maxwell - Confidential
 2 A. No.
 3 Q. Were you aware that Jeffrey was
 4 having sexual contact with [REDACTED] when
 5 she was 13 years old?
 6 MR. PAGLIUCA: Object to the form
 7 and foundation.
 8 A. I would be very shocked and
 9 surprised if that were true.
 10 Q. Were you in the house when [REDACTED]
 11 [REDACTED] was in the house in a private area
 12 with Jeffrey Epstein?
 13 MR. PAGLIUCA: Object to the form
 14 and foundation.
 15 A. Can you repeat the question.
 16 Q. Were you ever in the Palm Beach
 17 house when Jeffrey Epstein was in the house
 18 with [REDACTED]?
 19 MR. PAGLIUCA: Object to the form
 20 and foundation.
 21 A. I've already testified that I have
 22 met her and that she was there [REDACTED]
 23 [REDACTED] I don't understand what your
 24 question is asking.
 25 Q. So you have never seen [REDACTED]

Page 40

1 G Maxwell - Confidential
 2 [REDACTED]?
 3 MR. PAGLIUCA: Object to the form
 4 and foundation.
 5 Q. Is that your testimony?
 6 A. I already said I don't recall all
 7 the times I've seen her and I have no memory
 8 of that.
 9 Q. Have you ever seen [REDACTED] in
 10 the house with Jeffrey Epstein [REDACTED]
 11 [REDACTED]?
 12 MR. PAGLIUCA: Object to the form
 13 and foundation.
 14 A. I just told you I don't recall
 15 seeing [REDACTED].
 16 Q. Were you ever involved in an orgy
 17 with [REDACTED]?
 18 A. No, absolutely not.
 19 Q. Can you tell me, do you know an
 20 individual by the name of Nadia Marcinkova?
 21 A. I do.
 22 Q. How did you meet Nadia Marcinkova?
 23 A. At some point she was a friend of
 24 Jeffrey's and I recall meeting her at some
 25 point.

Page 41

1 G Maxwell - Confidential
 2 Q. Did you hire her?
 3 A. First of all, I don't hire girls
 4 like that, so let's be clear, I already
 5 testified to that, and I have no idea what
 6 you are referring to.
 7 Q. When you say girls like that, what
 8 do you mean?
 9 A. I hire people who are professional
 10 at the house. You are asking if I hired
 11 somebody to do what, I don't know what you
 12 are talking about. I hired people to work in
 13 the homes.
 14 Q. What was Nadia Marcinkova doing?
 15 MR. PAGLIUCA: Object to the form
 16 and foundation.
 17 A. I have no idea what Nadia
 18 Marcinkova was doing. I didn't hire her and
 19 I don't know what you are referring to.
 20 Q. You met Nadia Marcinkova?
 21 A. I testified I did.
 22 Q. Did she work for Jeffrey Epstein?
 23 A. I have no idea what she did.
 24 Q. Have you flown on planes with Nadia
 25 Marcinkova?

Page 46

1 G Maxwell - Confidential
 2 Q. Did Jeffrey arrange for a visa for
 3 Nadia Marcinkova?
 4 A. I don't know what Jeffrey did. I
 5 cannot testify what Jeffrey did.
 6 Q. Was Nadia involved in sex with
 7 Jeffrey and other girls?
 8 MR. PAGLIUCA: Object to the form
 9 and foundation.
 10 Q. Girls under the age of 18?
 11 MR. PAGLIUCA: Same objection.
 12 A. I have no idea.
 13 Q. Was Nadia involved with sex with
 14 Jeffrey and girls over the age of 18?
 15 MR. PAGLIUCA: Same objection.
 16 A. I have no idea.
 17 Q. Did Nadia recruit other girls for
 18 sex with Jeffrey?
 19 MR. PAGLIUCA: Object to the form
 20 and foundation.
 21 A. I have no idea.
 22 Q. Do you still talk to Nadia?
 23 A. No.
 24 Q. Is she a pilot?
 25 A. I have no idea.

Page 47

1 G Maxwell - Confidential
 2 Q. Does she fly with Larry Veseski
 3 (phonetic), one of Jeffrey's pilots?
 4 A. I have no idea.
 5 Q. Are you a pilot?
 6 A. I am.
 7 Q. Have you flown with Jeffrey Veseki?
 8 A. I have.
 9 Q. Have you flown with Nadia
 10 Marcinkova?
 11 A. What do you mean by flown?
 12 Q. Have you been on planes with her?
 13 A. I already testified I don't recall
 14 having her on a plane with me.
 15 Q. Do you know Sarah Kellen?
 16 A. I do.
 17 Q. When did you first meet her?
 18 A. I don't recall exact dates.
 19 Q. Did you meet her with the purpose
 20 of hiring her to work for Jeffrey or having
 21 Jeffrey hire her?
 22 MR. PAGLIUCA: Object to the form
 23 and foundation.
 24 A. No.
 25 Q. What was her relationship with

Page 48

1 G Maxwell - Confidential
 2 Jeffrey?
 3 MR. PAGLIUCA: Object to the form
 4 and foundation.
 5 A. I don't know exactly the nature of
 6 her relationship but she worked for him.
 7 Q. What did she do?
 8 MR. PAGLIUCA: Object to the form
 9 and foundation.
 10 A. At the time she when was with him I
 11 believe she traveled with him and helped with
 12 his travel arrangements.
 13 Q. Did she bring girls to the house to
 14 give massages to Jeffrey?
 15 MR. PAGLIUCA: Object to the form
 16 and foundation.
 17 A. I don't know what Sarah did.
 18 Q. So you never observed Sarah
 19 bringing girls to the home to give massages
 20 to Jeffrey?
 21 MR. PAGLIUCA: Object to the form
 22 and foundation.
 23 A. I don't understand the question,
 24 what did you mean bring?
 25 Q. Did you ever observe Sarah

Page 49

1 G Maxwell - Confidential
 2 inviting, bringing, walking anyone into the
 3 home to give a massage for Jeffrey?
 4 MR. PAGLIUCA: Object to the form
 5 and foundation.
 6 A. I don't recollect anything like
 7 that.
 8 Q. Are you aware that Sarah Kellen was
 9 a co-conspirator, named as a co-conspirator
 10 in the case involving Jeffrey Epstein?
 11 MR. PAGLIUCA: Object to the form
 12 and foundation and also calls for a
 13 legal conclusion.
 14 MS. McCAWLEY I'm just asking if she
 15 is aware of that.
 16 A. I am aware.
 17 Q. Who paid Sarah Kellen?
 18 A. I have no idea.
 19 Q. Did you ever arrange payment for
 20 any of the employees at the home?
 21 MR. PAGLIUCA: Object to the form.
 22 A. What do you mean by arrange?
 23 Q. Were you ever in charge or
 24 responsible for paying individuals at the
 25 home, that worked there?

Page 54

1 G Maxwell - Confidential
 2 A. I have.
 3 Q. No, you haven't.
 4 A. Yes, I have.
 5 Q. You are refusing to answer the
 6 question.
 7 A. Let's move on.
 8 Q. I'm in charge of the deposition. I
 9 say when we move on and when we don't.
 10 You are here to respond to my
 11 questions. If you are refusing to answer the
 12 court will bring you back for another
 13 deposition to answer these questions.
 14 Do you understand that?
 15 MR. PAGLIUCA: You don't need to
 16 threaten the witness.
 17 MS. McCAWLEY: I'm not threatening
 18 her. I'm making sure the record is
 19 clear.
 20 MR. PAGLIUCA: Certainly can you
 21 apply to have someone come back and the
 22 court may or may not have her come back
 23 again.
 24 Again, she is not answering
 25 questions that relate to adult consent

Page 55

1 G Maxwell - Confidential
 2 sex acts. Period. And that's the
 3 instruction and we can take it up with
 4 the court.
 5 Q. Ms. Maxwell, are you aware of any
 6 sexual acts with masseuses and Jeffrey
 7 Epstein that were nonconsensual?
 8 A. No.
 9 Q. How do you know that?
 10 A. All the time that I have been in
 11 the house I have never seen, heard, nor
 12 witnessed, nor have reported to me that any
 13 activities took place, that people were in
 14 distress, either reported to me by the staff
 15 or anyone else. I base my answer based on
 16 that.
 17 Q. Are you familiar with a person by
 18 the name of Annie Farmer?
 19 A. I am.
 20 Q. Has Annie Farmer given a statement
 21 to police about you performing sexual acts on
 22 her?
 23 A. I have not heard that.
 24 Q. Has Annie Farmer given a statement
 25 to police about Jeffrey Epstein performing

Page 56

1 G Maxwell - Confidential
 2 sexual acts on her?
 3 MR. PAGLIUCA: Object to the form
 4 and foundation.
 5 A. I have not heard that.
 6 Q. How do you know Annie Farmer?
 7 A. Annie Farmer had a sister and her
 8 sister introduced Annie Farmer, I believe, to
 9 Jeffrey.
 10 Q. Was Annie Farmer under the age of
 11 18?
 12 MR. PAGLIUCA: Object to the form
 13 and foundation.
 14 A. I don't recall how old Annie Farmer
 15 was.
 16 Q. Did she tell police that Jeffrey
 17 Epstein assaulted her sexually?
 18 MR. PAGLIUCA: Object to the form
 19 and foundation.
 20 A. I never heard that.
 21 Q. Did Sarah Kellen recruit or bring
 22 girls to the home that were under the age of
 23 18?
 24 MR. PAGLIUCA: Object to the form
 25 and foundation and I think this has been

Page 57

1 G Maxwell - Confidential
 2 asked and answered already.
 3 Q. You can answer the question.
 4 A. I have no idea what Sarah Kellen
 5 did.
 6 Q. You never observed Sarah Kellen
 7 with girls under the age of 18 at Jeffrey's
 8 home?
 9 MR. PAGLIUCA: Object to the form
 10 and foundation.
 11 A. The answer is no, I have no idea.
 12 Q. Do you know Glenn Dubin?
 13 A. I do.
 14 Q. What is your relationship with
 15 Glenn Dubin?
 16 MR. PAGLIUCA: Object to the form.
 17 A. What do you mean what is my
 18 relationship.
 19 Q. Are you friendly with him, how do
 20 you know him?
 21 A. He is the husband of Eva Dubin.
 22 Q. Is Eva Dubin one of your friends?
 23 A. Yes.
 24 Q. Did you ever send Virginia to
 25 Glenn's condo at the Breakers to give him a

Page 58

1 G Maxwell - Confidential
 2 massage?
 3 MR. PAGLIUCA: Objection to the
 4 form and foundation.
 5 A. No.
 6 Q. Did you ever instruct Virginia
 7 Roberts to have sex with Glenn?
 8 MR. PAGLIUCA: Objection to the
 9 form and foundation.
 10 A. I have never instructed Virginia to
 11 have sex with anybody ever.
 12 Q. How old was Eva Anderson when she
 13 met Jeffrey?
 14 MR. PAGLIUCA: Objection to the
 15 form and foundation.
 16 A. I have no idea.
 17 Q. What's she under the age of 18?
 18 MR. PAGLIUCA: Objection to the
 19 form and foundation.
 20 A. I just testified I have idea how
 21 old she was.
 22 Q. You testified she was your friend.
 23 You don't know how old she was when she met
 24 Jeffrey?
 25 A. That happened sometime in the '70s,

Page 59

1 G Maxwell - Confidential
 2 how would I know, or '80s. I have no idea.
 3 Can you testify to what your friends did 30
 4 years ago?
 5 Q. You don't ask the questions here,
 6 Ms. Maxwell.
 7 What about Johanna Sjoberg, when
 8 did you first meet Johanna?
 9 A. I don't recall the exact date.
 10 Q. Did you hire Johanna?
 11 A. I don't hire people, she came to
 12 work at the house to answer phones.
 13 Q. Where did you meet her?
 14 A. I just testified, I don't recall
 15 exactly when I met her.
 16 Q. Was one of your job
 17 responsibilities to interview people that
 18 would be then hired by Jeffrey?
 19 A. That was one of my
 20 responsibilities.
 21 Q. Do you recall interviewing Johanna?
 22 A. I don't recall the exact interview,
 23 no.
 24 Q. Do you know what tasks Johanna was
 25 hired to performance?

Page 60

1 G Maxwell - Confidential
 2 A. She was tasked to answer
 3 telephones.
 4 Q. Did you ever ask her to rub
 5 Jeffrey's feet?
 6 MR. PAGLIUCA: Objection to the
 7 form and foundation.
 8 A. I believe that I have read that,
 9 but I don't have any memory of it.
 10 Q. Did you ever tell Johanna that she
 11 would get extra money if she provided Jeffrey
 12 massages?
 13 A. I was always happy to give career
 14 advice to people and I think that becoming
 15 somebody in the healthcare profession, either
 16 exercise instructor or nutritionist or
 17 professional massage therapist is an
 18 excellent job opportunity. Hourly wages are
 19 around 7, 8, \$9 and as a professional
 20 healthcare provider you can earn somewhere
 21 between as we have established 100 to \$200
 22 and to be able to travel and have a job that
 23 pays that is a wonderful job opportunity. So
 24 in the context of advising people for
 25 opportunities for work, it is possible that I

Page 61

1 G Maxwell - Confidential
 2 would have said that she should explore that
 3 as an option.
 4 Q. Did you tell her she would get
 5 extra money if she massaged Jeffrey?
 6 A. I'm just saying, I cannot recall
 7 the exact conversation. I give career advice
 8 and I have done that.
 9 Q. Did you ever have Johanna massage
 10 you?
 11 A. I did.
 12 Q. How many times?
 13 A. I don't recall how many times.
 14 Q. Was there sex involved?
 15 A. No.
 16 Q. Did you ever instruct Johanna to
 17 massage Glenn Dubin?
 18 A. I don't believe -- I have no
 19 recollection of it.
 20 Q. Did you ever have sexual contact
 21 with Johanna?
 22 MR. PAGLIUCA: Object to the form
 23 and foundation. You need to give me an
 24 opportunity to get in between the
 25 questions.

Page 62

1 G Maxwell - Confidential
 2 Anything that involves consensual
 3 sex on your part, I'm instructing you
 4 not to answer.
 5 Q. Did you ever have sexual contact
 6 with Johanna?
 7 A. Again, she is an adult --
 8 Q. I'm asking you, did you ever have
 9 sexual contact with Johanna?
 10 A. I've just been instructed not to
 11 answer.
 12 Q. On what basis?
 13 A. You have to ask my lawyer.
 14 Q. Did you ever have sexual contact
 15 with Johanna that was not consensual on
 16 Johanna's part?
 17 MR. PAGLIUCA: You can answer
 18 nonconsensual.
 19 A. I've never had nonconsensual sex
 20 with anybody.
 21 Q. Not Annie Farmer?
 22 MR. PAGLIUCA: Objection.
 23 A. I just testified I never had
 24 nonconsensual sex with anybody ever, at any
 25 time, at anyplace, at any time, with anybody.

Page 63

1 G Maxwell - Confidential
 2 Q. So if Johanna were to testify that
 3 she did not consent to a sexual act that you
 4 participated in --
 5 A. I just told you I have never ever
 6 under any circumstances with anybody, at any
 7 time, in anyplace, in any form had
 8 nonconsensual relations with anybody.
 9 Q. Did you introduce Johanna to Prince
 10 Andrew?
 11 MR. PAGLIUCA: Objection to the
 12 form and foundation.
 13 A. I've, again, read that Johanna
 14 claimed that she met or that she said she met
 15 Prince Andrew. I don't know if I was the one
 16 who made the introduction or not.
 17 Q. Do you know a female by the name of
 18 Emmy Taylor?
 19 A. I do.
 20 Q. How do you know her?
 21 A. Emmy was my assistant.
 22 Q. So she worked for you?
 23 A. Yes.
 24 Q. Did you hire her?
 25 A. Again, Jeffrey hired people.

Page 64

1 G Maxwell - Confidential
 2 Q. Did you have sex with her?
 3 MR. PAGLIUCA: This is the same
 4 instruction about consensual or
 5 nonconsensual.
 6 Q. Was Emmy under the age of 18 when
 7 you hired her?
 8 A. No. I didn't hire her, as I said,
 9 Jeffrey did.
 10 Q. Did Emmy ever have sex with
 11 Jeffrey?
 12 MR. PAGLIUCA: Objection to the
 13 form and foundation.
 14 A. How would I know what somebody else
 15 did.
 16 Q. You weren't involved in the sex
 17 between Jeffrey, Emmy and yourself?
 18 A. We already --
 19 Q. Were you involved with sex between
 20 Jeffrey, Emmy and yourself?
 21 MR. PAGLIUCA: Everyone is talking
 22 over each other. You heard the
 23 question.
 24 Again, you you know what the
 25 instruction is. If there is any

Page 65

1 G Maxwell - Confidential
 2 consensual issue involved, I instruct
 3 you not to answer.
 4 A. Moving on.
 5 Q. So you are refusing to answer that
 6 question?
 7 A. I've been instructed by my lawyer.
 8 Q. Did you ever have sex with Jeffrey,
 9 Emmy, Virginia and yourself when Virginia was
 10 underage?
 11 A. Absolutely not.
 12 MR. PAGLIUCA: We've been going for
 13 about an hour. I would like to take a
 14 five-minute break, please.
 15 MS. McCAWLEY: I'm almost done.
 16 MR. PAGLIUCA: You are not going to
 17 allow a break.
 18 MS. McCAWLEY: As soon as I get
 19 through my line of questioning, which is
 20 perfectly appropriate.
 21 Q. Did Emmy Taylor travel with you and
 22 Jeffrey to Europe?
 23 A. I'm sure she did.
 24 Q. What is she doing today?
 25 A. I have no idea.

Page 78

1 G Maxwell - Confidential
 2 over to the house in Palm Beach to give
 3 massages?
 4 A. It's important to understand that I
 5 wasn't with Jeffrey all the time. In fact, I
 6 was only in the house less than half the
 7 time, so I cannot testify to when I wasn't in
 8 the house how often she came when I wasn't
 9 there.
 10 What I can say is that I barely
 11 would remember her, if not for all of this
 12 rubbish, I probably wouldn't remember her at
 13 all, except she did come from time to time
 14 but I don't recollect her coming as often as
 15 she portrayed herself.
 16 Q. How many times a day on an average
 17 day would Jeffrey Epstein get a massage?
 18 MR. PAGLIUCA: Objection to the
 19 form and foundation.
 20 A. When I was at the house and when I
 21 was there with him, he received a massage, on
 22 average, about once a day.
 23 Q. Just once?
 24 A. Yes.
 25 Q. Were there days when he received

Page 79

1 G Maxwell - Confidential
 2 four or five?
 3 MR. PAGLIUCA: Objection to the
 4 form and foundation.
 5 A. When I was present at the house, I
 6 never saw something like that.
 7 Q. Do you know if Virginia was
 8 required to be on call at all times to come
 9 to the house if Jeffrey wanted her there?
 10 MR. PAGLIUCA: Objection to the
 11 form and foundation.
 12 A. I have no idea of the arrangements
 13 that Virginia made with Jeffrey.
 14 Q. When Virginia was in New York,
 15 would Virginia sleep at Jeffrey's mansion in
 16 New York?
 17 MR. PAGLIUCA: Objection to the
 18 form and foundation.
 19 A. I don't recollect her being in New
 20 York and I have no idea where she slept.
 21 Q. You don't ever remember seeing
 22 Virginia Roberts in New York?
 23 MR. PAGLIUCA: Objection to the
 24 form and foundation.
 25 A. I would barely recollect her at

Page 80

1 G Maxwell - Confidential
 2 all, except for this story.
 3 Q. Do you recall Virginia Roberts
 4 calling you because she was having a medical
 5 crisis and you and Jeffrey taking her to the
 6 hospital?
 7 A. I have heard this absurd story and
 8 if any part of it were true I would remember
 9 that. I do not.
 10 Q. You don't remember taking her to
 11 the hospital?
 12 A. It's not that I don't remember it,
 13 it didn't happen.
 14 Q. How do you know it didn't happen?
 15 A. That's the sort of memory you would
 16 recall.
 17 Q. Do you recall, you said you don't
 18 remember her being at the New York mansion.
 19 When you were in New York would you stay at
 20 the New York mansion with Jeffrey?
 21 A. I stayed from time to time.
 22 Q. Do you recall Virginia being at the
 23 New York mansion when Prince Andrew came to
 24 visit?
 25 MR. PAGLIUCA: Objection to the

Page 81

1 G Maxwell - Confidential
 2 form and foundation.
 3 A. Like I told you, I don't recall her
 4 being at the house at all.
 5 Q. How many homes does Jeffrey have?
 6 MR. PAGLIUCA: Objection to the
 7 form and foundation.
 8 A. When I was working for him, I think
 9 he had six maybe.
 10 Q. Would Virginia stay with him in
 11 those homes?
 12 MR. PAGLIUCA: Objection to the
 13 form and foundation.
 14 A. I can only testify for when I was
 15 present with him and I cannot say what she
 16 did when I wasn't present with him.
 17 Q. When you were present, would
 18 Virginia stay in the homes with him?
 19 A. I don't recall her staying in the
 20 houses.
 21 Q. Did you train Virginia on how to
 22 recruit other girls for massages?
 23 MR. PAGLIUCA: Objection to the
 24 form and foundation.
 25 A. No.

Page 82

1 G Maxwell - Confidential
 2 Q. Did you train Virginia on how to
 3 recruit other girls to perform sexual
 4 massages?
 5 MR. PAGLIUCA: Objection to the
 6 form and foundation.
 7 A. No. And it's absurd and her entire
 8 story is one giant tissue of lies and
 9 furthermore, she herself has -- if she says
 10 that, you have to ask her about what she did.
 11 Q. Does Jeffrey like to have his
 12 nipples pinched during sexual encounters?
 13 MR. PAGLIUCA: Objection to form
 14 and foundation.
 15 A. I'm not referring to any advice on
 16 my counsel. I'm not talking about any adult
 17 sexual things when I was with him.
 18 Q. When Jeffrey would have a massage,
 19 would he request that the masseuse pinch his
 20 nipples while he was having a massage?
 21 A. I'm not talking about anything with
 22 consensual adult situation.
 23 Q. What about with underage --
 24 A. I am not aware of anything.
 25 Q. You are not aware of Jeffrey

Page 83

1 G Maxwell - Confidential
 2 Epstein ever having sex with an underage
 3 minor and asking them to pinch his nipples?
 4 A. I am not.
 5 Q. So I'm going to direct you to, I
 6 believe it's Maxwell Exhibit 1, the police
 7 report.
 8 Are you aware that over 30 under
 9 age minors gave testimony to police that they
 10 were engaged in sexual acts during,
 11 quote-unquote, massages.
 12 MR. PAGLIUCA: The witness needs to
 13 find Exhibit 1. Exhibit 1 -- if you can
 14 hand me that please.
 15 Q. So now with respect to the police
 16 report, are you aware that over 30 underage
 17 girls, meaning under the age of 18 gave
 18 reports to police that they were assaulted
 19 sexually by Jeffrey Epstein during massages?
 20 MR. PAGLIUCA: Objection to the
 21 form and foundation.
 22 A. I read the police report. That's
 23 all I can testify to.
 24 Q. Are you aware of what is in the
 25 police report? Are you aware that there were

Page 84

1 G Maxwell - Confidential
 2 30 girls --
 3 A. I did not count the number of girls
 4 and I did read the police report. I can only
 5 testify to what I read.
 6 Q. So you are aware that the police
 7 report contains reports from 30 underage
 8 girls?
 9 A. I can't testify to what the girls
 10 said. I can only testify to the fact that I
 11 read a police report that stated that.
 12 Q. Were you working for Jeffrey -- you
 13 said you worked for him off an on until 2009,
 14 is that correct?
 15 A. I helped out from time to time.
 16 Q. So you were working with him during
 17 the time period when these underage girls
 18 were visiting Jeffrey's home?
 19 MR. PAGLIUCA: Objection to the
 20 form and foundation.
 21 A. I was not -- what year, I need
 22 years.
 23 Q. How about let's say 2005?
 24 A. I'm not sure I was at the house at
 25 all in 2005, maybe one day, maybe.

Page 85

1 G Maxwell - Confidential
 2 Q. How about 2004?
 3 A. I was present for his mother's --
 4 his mother died in 2004 so I was there for
 5 his mother's death and the funeral and I was
 6 at the house maybe a handful of days, again.
 7 Q. I would like to direct you to, you
 8 have it pulled together now, it's page 39,
 9 Bates stamped Giuffre 00040?
 10 A. Can you repeat that, please.
 11 Q. Sure. 00040.
 12 A. Yes.
 13 Q. At the top of that document, about
 14 three lines down, you see the redacted
 15 portions where there is black so it blacks
 16 out the name.
 17 A. I see black redacted portions.
 18 Q. That's a black redaction of the
 19 name of the minor and there is -- I will
 20 represent for the record that's what it is.
 21 You can contest that but I'm not asking about
 22 the name of the minor.
 23 Five lines down, it says, She was
 24 just 16 years of age.
 25 Do you see that?

| | |
|---|--|
| Page 94 | Page 96 |
| <p>1 G Maxwell - Confidential</p> <p>2 Q. I'm asking the questions. I know</p> <p>3 what this case is about. I'm trying to -- I</p> <p>4 will ask you questions if you don't</p> <p>5 understand the question I can break it down</p> <p>6 for you. I'm happy to do that.</p> <p>7 A. Break it down a lot please.</p> <p>8 Q. I will do that.</p> <p>9 The question is, have you ever said</p> <p>10 to anybody that you recruit other girls --</p> <p>11 A. Why don't you stop there.</p> <p>12 Q. Let me finish my question.</p> <p>13 Have you ever said to anybody that</p> <p>14 you recruit girls to take the pressure off</p> <p>15 you, so you won't have to have sex with</p> <p>16 Jeffrey, have you said that?</p> <p>17 That's the question?</p> <p>18 A. You don't ask me questions like</p> <p>19 that. First of all, you are trying to trap</p> <p>20 me, I will not be trapped. You are asking me</p> <p>21 if I recruit, I told you no. Girls meaning</p> <p>22 underage, I already said I don't do that with</p> <p>23 underage people and as to ask me about a</p> <p>24 specific conversation I had with language, we</p> <p>25 talking about almost 17 years ago when this</p> | <p>1 G Maxwell - Confidential</p> <p>2 testify to actual language.</p> <p>3 Q. So you won't testify to anything</p> <p>4 I'm asking you 17 years ago about a statement</p> <p>5 you made. How do you know it's 17 years ago?</p> <p>6 A. We are talking about a time in</p> <p>7 2000, right?</p> <p>8 Q. Have you ever said that to anybody?</p> <p>9 A. I'm 54 years old so you are asking</p> <p>10 me in my entire life, what words are you</p> <p>11 asking me in my entire life?</p> <p>12 Q. Your entire life is limited by the</p> <p>13 time you were with Jeffrey, this is the</p> <p>14 question.</p> <p>15 A. Let's time limit the question you</p> <p>16 are asking me.</p> <p>17 Q. So from, let's say, I think you</p> <p>18 said you started with him in 1992, is that</p> <p>19 correct, and finished with him in 2009.</p> <p>20 So from 1992 to 2009 have you ever</p> <p>21 said to anybody that you recruit other and we</p> <p>22 will start with girls to take the pressure</p> <p>23 off you to have sex with Jeffrey?</p> <p>24 MR. PAGLIUCA: Objection to the</p> <p>25 form and foundation.</p> |
| Page 95 | Page 97 |
| <p>1 G Maxwell - Confidential</p> <p>2 took place. I cannot testify to an actual</p> <p>3 conversation or language that I used with</p> <p>4 anybody at any time.</p> <p>5 Q. Have you ever said to anybody that</p> <p>6 you recruit other females over the age of 18</p> <p>7 to take the pressure off you to having to</p> <p>8 have sex with Jeffrey?</p> <p>9 A. I totally resent and find it</p> <p>10 disgusting that you use the word recruit. I</p> <p>11 already told you I don't know what you are</p> <p>12 saying about that and your implication is</p> <p>13 repulsive.</p> <p>14 Q. Answer my question.</p> <p>15 A. I just did.</p> <p>16 Q. Have you ever said to anybody that</p> <p>17 you recruit females --</p> <p>18 A. I don't recruit anybody.</p> <p>19 Q. That's an answer. So you never</p> <p>20 said that?</p> <p>21 A. I'm testifying that I cannot</p> <p>22 testify to an actual language --</p> <p>23 Q. It's a yes or no.</p> <p>24 A. I will not testify to an actual</p> <p>25 statement made 17 years ago, so I cannot</p> | <p>1 G Maxwell - Confidential</p> <p>2 A. First of all I resent and despise</p> <p>3 the world recruit. Would you like to define</p> <p>4 what you mean by recruit and by girls, you</p> <p>5 mean underage people. I never had to do</p> <p>6 anything with underage people. So why don't</p> <p>7 you reask the question in a way that I am</p> <p>8 able to answer it.</p> <p>9 Q. I'm asking if you ever said that to</p> <p>10 anybody. So if you don't understand the word</p> <p>11 recruit and you never used that word then the</p> <p>12 answer to that question would be no.</p> <p>13 A. I have no memory as I sit here</p> <p>14 today having used that word.</p> <p>15 Q. Did you ever meet an underage girl</p> <p>16 in London to introduce her to Jeffrey to</p> <p>17 provide him with a massage?</p> <p>18 MR. PAGLIUCA: Objection to the</p> <p>19 form and foundation.</p> <p>20 A. Run that past me one more time.</p> <p>21 Q. Did you ever meet an underage girl</p> <p>22 in London to introduce her to Jeffrey to</p> <p>23 perform a massage?</p> <p>24 MR. PAGLIUCA: Same objection.</p> <p>25 A. Are you asking me if I met anybody</p> |

Page 98

1 G Maxwell - Confidential
 2 that was underage in London specifically to
 3 provide a massage to Jeffrey, is that your
 4 question?
 5 Q. Yes.
 6 A. No.
 7 Q. Do you know who Alexander Dixon is?
 8 A. I don't recall her right now.
 9 Q. Do you know if -- strike that.
 10 During the time that you were
 11 working for Jeffrey, did you ever observe any
 12 foreign females, so in other words, not from
 13 the United States, that were brought to
 14 Jeffrey's home to perform massages?
 15 MR. PAGLIUCA: Objection to the
 16 form and foundation.
 17 A. Females, what age are we talking?
 18 Q. Any age.
 19 A. Can you repeat the question?
 20 Q. During the time you were working
 21 for Jeffrey, did you ever observe any foreign
 22 females of any age that were at Jeffrey's
 23 home to perform a massage?
 24 MR. PAGLIUCA: Objection to the
 25 form and foundation.

Page 99

1 G Maxwell - Confidential
 2 A. Are you asking me if any foreigner,
 3 not an American person, gave Jeffrey a
 4 massage?
 5 Q. Yes.
 6 A. Well, as I sit here today, I can't
 7 think of anyone who is foreign. Certainly --
 8 I just can't think of anybody right this
 9 second.
 10 Q. How about any foreign girls who
 11 were under the age of 18?
 12 A. I already testified to not knowing
 13 anything about underage girls.
 14 Q. Were there foreign girls who were
 15 brought to Jeffrey's home by Jean Luc Brunel
 16 for the purposes of providing massages?
 17 MR. PAGLIUCA: Objection to the
 18 form and foundation.
 19 A. I am not aware of Jean Luc bringing
 20 girls. I have not no idea what you are
 21 talking about.
 22 Q. You have never been around foreign
 23 girls who are under the age of 18 at
 24 Jeffrey's homes?
 25 MR. PAGLIUCA: Objection to the

Page 100

1 G Maxwell - Confidential
 2 form and foundation.
 3 A. I already testified about not
 4 knowing about underage girls.
 5 Q. Did you provide any assistance with
 6 obtaining visas for foreign girls that were
 7 under the age of 18?
 8 A. I've never participated in helping
 9 people of any age to get visas.
 10 Q. Did Jeffrey, was it Jeffrey's
 11 preference to start a massage with sex?
 12 MR. PAGLIUCA: Objection to the
 13 form and foundation.
 14 A. I think you should ask that
 15 question of Jeffrey.
 16 Q. Do you know?
 17 A. I don't believe that was his
 18 preference. I think -- you have to
 19 understand, a massage -- perhaps you are not
 20 really familiar with what massage is.
 21 Q. I am, I don't need a lecture on
 22 massage.
 23 A. I think you do.
 24 MR. PAGLIUCA: No question pending.
 25 She will ask you another question now.

Page 101

1 G Maxwell - Confidential
 2 A. Massage is for health benefits.
 3 Q. When did you first meet Jeffrey?
 4 A. Some point in 1991.
 5 Q. And did Jeffrey know your father?
 6 A. No.
 7 Q. How were you introduced to Jeffrey?
 8 A. Some friend introduced us.
 9 Q. Can you describe your relationship
 10 back in 1991, was it friendship or was it
 11 girlfriend relationship or was it a work
 12 relationship, what was your relationship in
 13 1991?
 14 A. It was just friendly.
 15 Q. Then I believe you testified you
 16 began working for him in 1992, is that
 17 correct?
 18 A. Yes.
 19 Q. In 1992 I know you gave me the
 20 description of the work that you were
 21 performing for him, how much was he paying
 22 you, do you remember?
 23 A. I don't recall.
 24 Q. Do you know for example in 2001 how
 25 much he was paying you?

Page 102

1 G Maxwell - Confidential
 2 A. I don't recall.
 3 Q. Did it change over the years or did
 4 the payment remain the same?
 5 A. I believe over the course of time
 6 it increased a little bit.
 7 Q. Was that the -- was that payment
 8 the payment that -- was the payment made with
 9 respect to the jobs, the work you were
 10 performing for Jeffrey, was that your sole
 11 income at that time?
 12 MR. PAGLIUCA: I object to the
 13 form. I'm also going to instruct you
 14 not to answer about sources of -- your
 15 personal sources of income outside of
 16 Mr. Epstein at all.
 17 MS. McCAWLEY: What's the basis for
 18 that?
 19 MR. PAGLIUCA: It's confidential,
 20 it's not part of this lawsuit.
 21 MS. McCAWLEY: We have a protective
 22 order and it is part of this lawsuit
 23 with respect to our damage claims.
 24 MR. PAGLIUCA: It's not and, in
 25 fact, you are not entitled to ask

Page 103

1 G Maxwell - Confidential
 2 financial information of a defendant in
 3 this kind of case, in a defamation case
 4 unless and until there is a finding that
 5 you are entitled to punitive damages.
 6 That is clear in New York case law, both
 7 state and Federal.
 8 MS. McCAWLEY: We disagree on that
 9 point and we will come back to that.
 10 Q. From the source of payment from the
 11 source of Jeffrey, from your work, can you
 12 give me a range on that, do you know was it
 13 over \$100,000?
 14 A. I just testified I don't recall.
 15 Q. You don't don't know if it was
 16 \$500,000?
 17 A. It was less than that.
 18 Q. Somewhere between 100 and 500,
 19 would that be fair to say?
 20 A. I believe it was between 100 and
 21 \$200,000.
 22 Q. Did Jeffrey during the time that
 23 you were working for him purchase a town home
 24 for you?
 25 A. The subject of the townhouse is, I

Page 104

1 G Maxwell - Confidential
 2 worked for it and I had a loan, we did loans.
 3 Q. So a loan through Jeffrey?
 4 A. I don't recall the exact
 5 transaction.
 6 Q. Did he purchase for you a
 7 helicopter during the time you were working
 8 for him?
 9 A. It was his helicopter.
 10 Q. When did you obtain your pilot
 11 license?
 12 A. I believe it was '98 or '99.
 13 Q. Was that for both airplanes and
 14 helicopters or just helicopters?
 15 A. Just helicopters.
 16 Q. Have you ever flown President
 17 Clinton on your helicopter?
 18 A. That is another one of Virginia's
 19 lies.
 20 Q. The question is have you ever done
 21 that?
 22 A. I have never flown President
 23 Clinton at any time ever, in any helicopter,
 24 in any place, any time, in any state, in any
 25 country, at any time anywhere.

Page 105

1 G Maxwell - Confidential
 2 Q. Have you ever had dinner with
 3 President Clinton at Jeffrey's home, at any
 4 of Jeffrey's homes?
 5 A. No, I don't believe so.
 6 Q. Have you traveled on Jeffrey's
 7 planes with President Clinton?
 8 A. Yes, I have.
 9 Q. Would that have been in 2002?
 10 A. It's very hard for me to recollect
 11 exact dates but that sounds about right.
 12 Q. Was that during the time that
 13 Virginia was working for Jeffrey?
 14 A. I don't know that Virginia ever did
 15 work for Jeffrey. I don't exactly know if
 16 she testified to her so-called duties, we
 17 know she is a serial liar so I can't testify
 18 to what she did or didn't do. So I object to
 19 that characterization of her. So repeat the
 20 question, please.
 21 Q. Can you read the question back?
 22 (Record read.)
 23 Q. You can answer the question.
 24 A. What was the question again?
 25 Q. When you were traveling on the

Page 106

1 G Maxwell - Confidential
 2 plane with President Clinton, was that during
 3 the time, it was 2002, that you were on a
 4 flight with Clinton, was that during the time
 5 Virginia was working for Jeffrey?
 6 MR. PAGLIUCA: Object to the form.
 7 Misstates the witness' answer and if you
 8 can answer the question, you can answer
 9 it.
 10 A. Well, like I said, I don't recall
 11 exactly when I flew with him. I don't recall
 12 when Virginia, we know what Virginia claims
 13 when she left, so I can't answer the
 14 question. I have no idea.
 15 Q. Do you know Prince Andrew?
 16 A. I do.
 17 Q. How long have you known him?
 18 A. A very long time.
 19 Q. Since you were a child?
 20 A. I really -- it's so long, it's
 21 really a long time ago. I just don't recall.
 22 Q. Do you remember how you first met
 23 him?
 24 A. No, I do not.
 25 Q. Did you introduce him to Jeffrey?

Page 107

1 G Maxwell - Confidential
 2 A. That would be another of Virginia's
 3 lies and the lies you perpetrate. I never
 4 introduced Prince Andrew to Jeffrey Epstein
 5 at any time ever, so just add that the to
 6 long list of lies.
 7 Q. Did Jeffrey know Prince Andrew?
 8 A. Clearly he knew him. I think we
 9 have that answer but how -- yeah.
 10 Q. Do you know how Jeffrey met Prince
 11 Andrew?
 12 A. I do not know Jeffrey met Prince
 13 Andrew. What I do know is that I did not
 14 introduce them. That is one of the many
 15 lies. Are we tallying all the lies?
 16 Q. Do you know when Jeffrey met Prince
 17 Andrew?
 18 A. I do not know when Jeffrey met
 19 Prince Andrew.
 20 Q. Did you ever introduce Prince
 21 Andrew to any girls under the age of 18 who
 22 were not friends of yours children?
 23 A. I have not introduced Prince Andrew
 24 to anyone that I am aware of other than
 25 friends of mine who have kids under that age

Page 108

1 G Maxwell - Confidential
 2 that he may have met socially through me.
 3 Q. Did you ever introduce Prince
 4 Andrew to Virginia in London?
 5 A. I understand her story about London
 6 but again, her tissue of lies is extremely
 7 hard to pick apart what is true and what
 8 isn't. Actually I wouldn't recollect her at
 9 all but for her tissue stories about this
 10 situation.
 11 Q. So did you ever introduce Prince
 12 Andrew to Virginia in London?
 13 A. I have no recollection.
 14 Q. Did Virginia ever stay at your home
 15 in London, your town home?
 16 A. I know she claims she did but if
 17 you are asking me here today to remember
 18 specifically, I cannot.
 19 Q. Do you remember taking a trip with
 20 Virginia to travel over to Europe, including
 21 London?
 22 A. So I have seen her reports and I
 23 have seen the plane reports. I see she says
 24 she was on that but again, I really have no
 25 recollection of her.

Page 109

1 G Maxwell - Confidential
 2 Q. Did you know that she was 17 at the
 3 time of that trip?
 4 MR. PAGLIUCA: Objection to the
 5 form and foundation.
 6 A. I have --
 7 Q. Did you know she was 17 at the time
 8 of that trip?
 9 MR. PAGLIUCA: Objection to the
 10 form and foundation.
 11 A. I didn't even know she was on the
 12 trip.
 13 Q. Did you hold her passport for her
 14 when she was traveling?
 15 MR. PAGLIUCA: Objection to the
 16 form and foundation.
 17 A. I have no recollection whatsoever
 18 of her even being on the trip nor holding her
 19 passport.
 20 (Maxwell Exhibit 4, picture, marked
 21 for identification.)
 22 Q. I'm showing you what we marked as
 23 Maxwell Exhibit 4.
 24 Can you take a look at that picture
 25 for me?

Page 110

1 G Maxwell - Confidential
 2 A. I've looked at it.
 3 Q. Are you in that picture?
 4 A. I am.
 5 Q. Is that Prince Andrew in the
 6 picture as well?
 7 A. It is.
 8 MR. PAGLIUCA: I don't believe this
 9 has been produced to us in discovery by
 10 you.
 11 MS. McCAWLEY: The picture?
 12 MR. PAGLIUCA: Yes.
 13 MS. McCAWLEY: It has.
 14 MS. MENNINGER: Is it the same
 15 exact photograph.
 16 MS. McCAWLEY: I believe so. We
 17 will find one. The picture has been
 18 produced a number of times.
 19 MR. PAGLIUCA: I've seen different
 20 iterations of this, I don't believe I
 21 have ever seen this.
 22 MS. McCAWLEY: We had them blow it
 23 up on a page so she could see it. We
 24 could use an article.
 25 While you are looking for that, I

Page 111

1 G Maxwell - Confidential
 2 will skip ahead. Hold that until we can
 3 find one that has the Bates range on it.
 4 Q. Do you recall Virginia being at
 5 your London town home?
 6 A. I do not.
 7 Q. Do you recall going to dinner with
 8 Prince Andrew, Jeffrey Epstein and Virginia
 9 Roberts in London, at any time?
 10 A. I do not.
 11 Q. Do you recall going to a place
 12 called Club Tramp with Prince Andrew, Jeffrey
 13 Epstein and yourself and Virginia Roberts?
 14 A. I would just like to state for the
 15 record that Prince Andrew is a very famous
 16 person, I know you are aware because you like
 17 to use him so often in your press stories --
 18 please let me finish. Were he at Tramp, at
 19 any time, that would be reported by the
 20 press. I do not have any recollection of it
 21 and I doubt it actually happened.
 22 Q. You don't recall that.
 23 Do you recall taking Virginia
 24 shopping when you were in London to buy an
 25 outfit to meet Prince Andrew?

Page 112

1 G Maxwell - Confidential
 2 A. No, I don't.
 3 Q. Where in your town home -- we will
 4 come back to that.
 5 Do you have guest bedrooms in your
 6 town home in London?
 7 A. I do.
 8 Q. How many?
 9 A. Two.
 10 Q. Did Prince Andrew ever visit
 11 Jeffrey and you in New York?
 12 A. Yes.
 13 Q. Do you remember him visiting you
 14 and Jeffrey in New York in the spring of
 15 2001?
 16 A. Again, I can't testify to any
 17 specific dates.
 18 Q. So you don't have a recollection of
 19 that?
 20 A. I have a recollection -- you've
 21 asked me if I have a recollection of being in
 22 New York but if you are asking for a date, I
 23 cannot confirm that date.
 24 Q. Do you remember Prince Andrew being
 25 present in New York for a party where Johanna

Page 113

1 G Maxwell - Confidential
 2 Sjoberg was also present?
 3 A. I don't recollect.
 4 Q. Do you recall ever giving Prince
 5 Andrew a gift of a puppet that was in the
 6 same -- that looked like him?
 7 A. I never gave him a gift of a
 8 puppet.
 9 Q. Did Jeffrey ever give him a gift of
 10 a puppet?
 11 A. No, not that I am aware of.
 12 Q. Have you ever given him any gifts?
 13 MR. PAGLIUCA: Objection,
 14 foundation.
 15 A. I know Andrew --
 16 Q. Have you ever given him any gifts
 17 that you remember when he came to Jeffrey's
 18 home in New York?
 19 A. I don't recall giving him any gifts
 20 in New York.
 21 (Maxwell Exhibit 5, picture, marked
 22 for identification.)
 23 Q. I think I directed you to page
 24 0034.
 25 Is that a picture that was taken at

Page 114

1 G Maxwell - Confidential
 2 your London town home?
 3 A. I have no idea what this picture
 4 was taken. I know what she purports it to be
 5 but I'm not going to say that I do.
 6 Q. Do the surroundings look like your
 7 London town home?
 8 A. They are familiar.
 9 Q. Do you know who took this picture?
 10 A. I do not.
 11 Q. Did Jeffrey Epstein take the
 12 picture?
 13 A. I just testified I don't know who
 14 took the picture.
 15 Q. So you don't know if Jeffery
 16 Epstein took the picture?
 17 A. When I tell you I don't know who
 18 took the picture, it doesn't mean him -- I
 19 don't know who took the picture. You can
 20 come up with 50 names, I still do not know
 21 who took the picture.
 22 Q. Did you observe Prince Andrew go
 23 into a room with Virginia alone in your town
 24 home?
 25 A. I cannot recall. As I have said,

Page 115

1 G Maxwell - Confidential
 2 no.
 3 Q. Did Prince Andrew ever tell you
 4 that he had sex with Virginia Roberts?
 5 A. He did not.
 6 Q. Did Jeffrey Epstein ever tell you
 7 that Prince Andrew had sex with Virginia
 8 Roberts?
 9 A. He did not.
 10 Q. Did Prince Andrew ever visit -- let
 11 me back up for a moment. We talked about
 12 Jeffrey's homes, did Jeffrey have a home in
 13 the U.S. Virgin islands called Little St.
 14 James?
 15 A. Yes.
 16 Q. Did Prince Andrew ever visit that
 17 island -- are you aware of Prince Andrew ever
 18 visiting Jeffrey's island?
 19 A. I am aware of that, yes.
 20 Q. Do you know how many times he
 21 visited?
 22 A. I do not.
 23 Q. Do you know if he visited when
 24 Virginia was on the island?
 25 A. I do not.

Page 116

1 G Maxwell - Confidential
 2 Q. Were you present on the island when
 3 Prince Andrew visited?
 4 A. Yes.
 5 Q. How many times?
 6 A. I can only remember once.
 7 Q. Were there any girls under the age
 8 of 18 on the island during that one visit
 9 that you remember that were not family or
 10 friends of or daughters of your friends?
 11 MR. PAGLIUCA: Objection to the
 12 form and foundation.
 13 A. There were no girls on the island
 14 at all. No girls, no women, other than the
 15 staff who work at the house. Girls meaning,
 16 I assume you are asking underage, but there
 17 was nobody female outside of the cooks and
 18 the cleaners.
 19 Q. Did you, as part of your duties in
 20 working for Jeffrey, ever arrange for
 21 Virginia to have sex with John Luc Brunel?
 22 MR. PAGLIUCA: Objection to the
 23 form and foundation.
 24 A. Just for the record, I have never
 25 at any time, at anyplace, in any moment ever

Page 117

1 G Maxwell - Confidential
 2 asked Virginia Roberts or whatever she is
 3 called now to have sex with anybody.
 4 Q. Did you ever provide Virginia
 5 Roberts with an outfit, an outfit of a sexual
 6 nature to wear for Les Wexner?
 7 MR. PAGLIUCA: Objection to the
 8 form and foundation.
 9 A. I think we addressed the outfit
 10 issue.
 11 Q. I am asking you if you ever
 12 provided her with an outfit of a sexual
 13 nature to wear for Les Wexner?
 14 A. Categorically no. You did get
 15 that, I said categorically no
 16 Q. Don't worry I'm paying attention.
 17 A. You seemed very distracted in that
 18 moment.
 19 (Maxwell Exhibit 6, flight logs,
 20 marked for identification.)
 21 A. Do you mind if I take a break for
 22 the bathroom.
 23 Q. It's 11:08 and we are going to go
 24 off the record now.
 25 THE VIDEOGRAPHER: It's now 11:09.

Page 146

1 G Maxwell - Confidential
 2 one of his planes?
 3 A. There was a bed on one of his
 4 planes that folded out, yes.
 5 Q. Do you recall whether with respect
 6 to this being in Santa Fe, do you recall
 7 whether you were there for some form of a
 8 party?
 9 MR. PAGLIUCA: Objection to the
 10 form and foundation.
 11 A. I don't recall the trip at all and
 12 this looks like a total work trip, not a
 13 party trip.
 14 Q. What would be the difference
 15 between a work trip and a party trip?
 16 A. Just that I would be on trips for
 17 work and I believe that this looks like, AP
 18 looks like it's one of the -- probably one of
 19 the designers and the time would meet with a
 20 trip to decorate the house, just the timing
 21 of it.
 22 Q. So would Virginia be brought on
 23 trips that were for the purpose of work and
 24 decorating the house?
 25 A. Like I said, I never worked with

Page 147

1 G Maxwell - Confidential
 2 her but you would have to ask Jeffrey what he
 3 brought her on the trip for.
 4 Q. But she would travel with him when
 5 there was a work trip like this?
 6 A. I can't -- I'm seeing that she is
 7 on this flight but I have no idea what she is
 8 doing, he invited her, it would not be my
 9 job.
 10 Q. What about Nadia Bjorlin, would she
 11 regularly travel with Jeffrey on flights?
 12 A. I have no idea, you would have to
 13 look through the flight logs. I have no
 14 idea.
 15 Q. Your recollection is -- what is
 16 your recollection, do you recollect Nadia
 17 traveling often on flights with Jeffrey?
 18 A. Absolutely not. No, not at all. I
 19 don't recollect her actually on the flight at
 20 all.
 21 Q. I think you can set that aside for
 22 the moment.
 23 (Maxwell Exhibit 9, message pad
 24 pages, marked for identification.)
 25 Q. We will mark as Exhibit 9 these

Page 148

1 G Maxwell - Confidential
 2 excerpts from -- we will identify what they
 3 are but from the message pads.
 4 Did you want to correct anything?
 5 A. I want to make an addendum.
 6 Would you mind rereading the last
 7 question back to me?
 8 (Record read.)
 9 A. I also just want to say that at
 10 this point I cannot recollect flying to
 11 parties. Jeffrey went for work so -- was
 12 this in Santa Fe, this flight as well.
 13 Q. The flight we were looking at, yes
 14 but it was to Santa Fe --
 15 A. I don't recall going to any parties
 16 in Santa Fe at any time but certainly flying
 17 to Santa Fe for a party seems highly
 18 improbable.
 19 Q. So I'm going to direct your
 20 attention to the document that I set before
 21 you which is Bates number [REDACTED] and it
 22 has different Bates numbers because it's a
 23 smaller version of the larger production.
 24 These are the pages I will be asking about.
 25 In the time that you were working

Page 149

1 G Maxwell - Confidential
 2 with Jeffrey in Palm Beach, do you recall a
 3 process for taking, anybody at the house
 4 taking messages when incoming phone calls
 5 came in?
 6 A. You are supposed to take a message
 7 and receive the message and write the message
 8 down. Who was the message was for, what time
 9 it was taken and who took it and what the
 10 message was, obviously.
 11 Q. Does what's in front of you look
 12 familiar with respect to the message pads
 13 that you would have used at the house?
 14 A. It is familiar.
 15 Q. I'm going to direct your attention
 16 to the second page of it?
 17 MR. PAGLIUCA: These all have SAO
 18 numbers on them or Bates ranges and I
 19 don't see any of your Bates ranges on
 20 these. I know you have produced message
 21 pads but those have your Bates range
 22 numbers on them and I'm wondering if
 23 these are different documents.
 24 MS. McCRAWLEY: It's the same, just
 25 ours have the Bates underneath them.

Page 150

1 G Maxwell - Confidential
 2 These were produced as part of the rule
 3 26 discovery. We can get the additional
 4 Bates if you want.
 5 Q. The one I'm asking about first is
 6 the [REDACTED]. You can look at that and then
 7 I will identify the Bates number referenced
 8 in this case.
 9 I want to direct your attention to
 10 the top right-hand corner just so I have an
 11 understanding of how these messages were
 12 taken. So I see that it says at the top it
 13 says in the for line it says Ms. Maxwell and
 14 the date of [REDACTED] and then I see under the
 15 M line it looks like Necole Hesse or
 16 something like that, a phone number and a
 17 message saying returning your call and on the
 18 bottom it looks like [REDACTED].
 19 Explain to me, is this -- does this
 20 represent [REDACTED] taking down a message for you
 21 from Ms. Hesse, is that how these work?
 22 MR. PAGLIUCA: Objection to the
 23 form and foundation. Go ahead.
 24 Q. My question is, I'm trying to
 25 understand how the messages were taken.

Page 151

1 G Maxwell - Confidential
 2 Looking at this message pad, where it says
 3 signed [REDACTED], can you tell me who [REDACTED] was?
 4 A. I cannot.
 5 Q. You do not know.
 6 Typically when these messages were
 7 taken in your practice when you were there,
 8 would the individual who took the message
 9 write their name on the message?
 10 MR. PAGLIUCA: Objection to the
 11 form and foundation.
 12 A. I don't recollect, you can ask who
 13 wrote it so you can find out who it was.
 14 Q. Do you know who Necole Hesse is?
 15 A. I don't.
 16 Q. I'm going to direct your
 17 attention -- do we have a Bates number for
 18 that?
 19 MR. EDWARDS: [REDACTED].
 20 Q. Giuffre [REDACTED] for that one.
 21 I will direct your attention to the
 22 first page which has the [REDACTED] on it.
 23 A. Okay.
 24 Q. Now at the top of that document, on
 25 the right-hand side, the message that reads

Page 152

1 G Maxwell - Confidential
 2 for JE, date 1/02/03, message Caroline Casey
 3 and then it's signed GM.
 4 Is that your signature?
 5 A. That's not my handwriting.
 6 Q. Would other people take a message,
 7 how did this process work, is there someone
 8 else in the house with the initials GM?
 9 MR. PAGLIUCA: Objection to the
 10 form and foundation.
 11 A. I cannot answer that. It's not my
 12 handwriting.
 13 Q. I'm trying to understand how this
 14 gets there. If you took a message and didn't
 15 write it down, would someone else record that
 16 message for you?
 17 MR. PAGLIUCA: Objection to the
 18 form and foundation.
 19 A. All I can tell you, this is not my
 20 handwriting so I cannot -- I have no idea
 21 what that is.
 22 Q. Was the practice that, what was the
 23 practice when someone answered the phone with
 24 these message pads, what were they supposed
 25 to do?

Page 153

1 G Maxwell - Confidential
 2 A. They were supposed to take a
 3 message and the time and date and give the
 4 message.
 5 Q. Were they supposed to indicate who
 6 took the message?
 7 A. They were but it wasn't -- I don't
 8 really recall the actual process. I can see
 9 from here it looks like you were supposed to
 10 but that's not my handwriting so I can't say
 11 what that was.
 12 Q. Do you know who Caroline Casey is?
 13 A. No, I don't.
 14 Q. Do you know whether Caroline Casey
 15 was under the age of 18?
 16 A. I just testified I couldn't
 17 remember who she was so it would be difficult
 18 to know how old she was.
 19 Q. Do you know if she was coming to
 20 the house to provide massages?
 21 A. I don't remember who she is at all,
 22 so no.
 23 Q. And then I would like to direct
 24 your attention to the message right
 25 underneath it. Which says JE: [REDACTED]

Page 154

1 G Maxwell - Confidential
 2 and has a phone number and the message says,
 3 wants to know if she should bring her friend
 4 [REDACTED] tonight.
 5 What is that message referring to?
 6 MR. PAGLIUCA: Objection to the
 7 form and foundation.
 8 A. I can't possibly know.
 9 Q. Did individuals at the house take
 10 messages for underage girls to come over and
 11 bring friends for the purpose of providing
 12 massages?
 13 MR. PAGLIUCA: Objection to the
 14 form and foundation.
 15 A. How would I possibly know what you
 16 are talking about.
 17 Q. Did you record messages at the
 18 house?
 19 A. It's not my job.
 20 Q. You did from time to time record
 21 messages?
 22 A. Hardly ever.
 23 Q. But you did from time to time do
 24 it?
 25 A. I'm just saying I hardly ever took

Page 155

1 G Maxwell - Confidential
 2 messages, very, very, very, very
 3 infrequently.
 4 Q. Do you know if [REDACTED] brought her
 5 friend [REDACTED] over on that night?
 6 MR. PAGLIUCA: Objection to the
 7 form and foundation.
 8 A. One, I don't know what this message
 9 is, I don't know if I was in Palm Beach, I
 10 don't know who [REDACTED] is, I don't know who
 11 [REDACTED] is and I don't know what this message
 12 is referring to.
 13 Q. So on January 2nd of 2003, were you
 14 in Palm Beach?
 15 A. I don't know.
 16 Q. Where would you have been other
 17 than Palm Beach at the time?
 18 A. I could have been anywhere.
 19 Q. Where did you typically live?
 20 A. What are you asking me?
 21 Q. So for example, in 2003, where was
 22 your primary residence, was it wherever
 23 Jeffrey was living and staying or was it
 24 independent of that?
 25 A. What was the date again.

Page 156

1 G Maxwell - Confidential
 2 Q. In 2003?
 3 A. The end of 2003?
 4 Q. January, the beginning.
 5 A. I don't know, I could have been
 6 anywhere, Jeffrey and I were leading almost
 7 separate lives by then.
 8 Q. If you were at the house that day,
 9 did you recall seeing anybody by the name of
 10 [REDACTED]
 11 MR. PAGLIUCA: Objection to the
 12 form and foundation.
 13 A. I don't know if I was at the house,
 14 so I can't testify to that.
 15 Q. Let's flip back to the next page,
 16 the one we were on before the [REDACTED], the
 17 message towards the bottom that says, for
 18 Jeffrey, message of Ghislaine. And it says,
 19 Would it be helpful to have and then redacted
 20 come to Palm Beach today to stay here and
 21 help train new staff with Ghislaine. Who
 22 were you referring to in that message; do you
 23 remember?
 24 MR. PAGLIUCA: Objection to the
 25 form and foundation.

Page 157

1 G Maxwell - Confidential
 2 Q. The question is, do you recall this
 3 message?
 4 A. I do not recall this message.
 5 Q. Do you recall training a female
 6 under the age of 18 at Jeffrey's home?
 7 MR. PAGLIUCA: Objection to the
 8 form and foundation.
 9 A. I never trained a female under the
 10 age of 18 at Jeffrey's home.
 11 Q. Did you ever say it would be
 12 helpful to have a female under the age of 18
 13 come to Palm Beach today to stay here and
 14 help train new staff with Ghislaine?
 15 A. I never asked anyone under the age
 16 of 18 come to help train new staff.
 17 Q. I'm going to flip to the next page
 18 which is [REDACTED].
 19 A. By the way, that is not my
 20 handwriting and it's not dated and I couldn't
 21 possibly tell you who that is.
 22 Did you hear that?
 23 Q. You got your testimony on the
 24 record.
 25 [REDACTED].

Page 158

1 G Maxwell - Confidential
 2 A. Yes.
 3 MR. EDWARDS: Giuffre [REDACTED].
 4 Q. I'm going to direct your attention
 5 to the top right-hand corner, for Mr.
 6 Epstein, [REDACTED], message [REDACTED], a phone
 7 number and called.
 8 Do you know who [REDACTED] is?
 9 A. I don't.
 10 Q. Do you know that [REDACTED] was 15 at
 11 the time she left this message?
 12 MR. PAGLIUCA: Objection to the
 13 form and foundation.
 14 A. I don't know who [REDACTED] is.
 15 Q. And then I'm going to direct your
 16 attention to the bottom left which is a
 17 message JE message of Jean Luc and the
 18 message says, He just did a good one, 18
 19 years, she spoke to me and said I love
 20 Jeffrey.
 21 Was Jean Luc referring to sex with
 22 an 18 year old in that message?
 23 MR. PAGLIUCA: Objection to the
 24 form and foundation.
 25 A. How could I know what Jean Luc is

Page 159

1 G Maxwell - Confidential
 2 referring to.
 3 Q. Do you know if Jean Luc had sex
 4 with an 18 year old that he referenced to
 5 Jeffrey Epstein?
 6 MR. PAGLIUCA: Objection to the
 7 form and foundation.
 8 A. How could I possibly know.
 9 Q. Did Jeffrey Epstein or Jean Luc
 10 ever tell you that Jean Luc had sex with an
 11 18 year old?
 12 MR. PAGLIUCA: Objection to the
 13 form and foundation.
 14 A. I have no idea what you are talking
 15 about.
 16 Q. Did they ever tell you that?
 17 A. I have no recollection of ever
 18 hearing such a ridiculous thing.
 19 Q. I will turn to the next page which
 20 is SAO 2841?
 21 MS. MENNINGER: Do you have the
 22 Bates number?
 23 Q. The bottom right-hand corner, Mr.
 24 Epstein, the date [REDACTED], Ms. Maxwell, it
 25 says, [REDACTED], it says, quote, [REDACTED] is

Page 160

1 G Maxwell - Confidential
 2 available on Tuesday, no one for tomorrow.
 3 Is this a message you took?
 4 A. It's not my handwriting and I don't
 5 know who R is.
 6 Q. So when it says Ms. Maxwell in the
 7 line there, is that you calling for Mr.
 8 Epstein?
 9 MR. PAGLIUCA: Objection to the
 10 form and foundation.
 11 A. I didn't write it, I don't know
 12 when this message was taken. I don't even
 13 know what it's referring to and I don't know
 14 what my name is doing on that message pad.
 15 Q. I know you said you only took them
 16 a few times. Do you have a recollection of
 17 taking messages of females who would call the
 18 house to indicate whether or not they were
 19 coming over?
 20 MR. PAGLIUCA: Objection to the
 21 form and foundation.
 22 A. Give me a date range.
 23 Q. On 7/9/04.
 24 A. How would I know if I'm in Palm
 25 Beach, most likely not.

Page 161

1 G Maxwell - Confidential
 2 Q. I'm asking if you have a
 3 recollection of taking messages for girls who
 4 would call the house --
 5 A. Girls.
 6 Q. Females, who would call the
 7 house --
 8 A. Over the age of 18.
 9 Q. [REDACTED] is 15.
 10 A. I don't know who [REDACTED] is, so I
 11 can't testify anything to [REDACTED].
 12 Q. Your name is on the message.
 13 A. I didn't put it there and I don't
 14 know what it's doing there.
 15 Q. So your testimony is you didn't
 16 take this message?
 17 A. I obviously didn't take the
 18 message, it's signed by somebody R, it's not
 19 my handwriting. We don't know if I'm in Palm
 20 Beach.
 21 Q. Did you arrange for [REDACTED] to have
 22 his friend [REDACTED] come over on Tuesday of
 23 this week?
 24 A. I don't know who [REDACTED] is so it
 25 would be hard for me to arrange anything with

Page 162

1 G Maxwell - Confidential
 2 someone I don't know.
 3 Q. Why is your name reflected on this
 4 message pad?
 5 MR. PAGLIUCA: Objection to the
 6 form and foundation.
 7 A. I have no idea. You would have to
 8 ask whoever took the message.
 9 Q. Did you, in the course of your
 10 work, regularly take messages for Jeffrey
 11 Epstein?
 12 A. I already testified I hardly ever
 13 did.
 14 Q. Would you, in the course of your
 15 work, regularly set up appointments for
 16 females to come over and give massages for
 17 Jeffrey Epstein?
 18 MR. PAGLIUCA: Objection to the
 19 form and foundation.
 20 A. Can you specify, females, you mean
 21 adults over the age of 18.
 22 Q. Did you regularly set up for
 23 Jeffery adults over the age of 18 to come for
 24 massages?
 25 A. I didn't regularly do that, no.

Page 163

1 G Maxwell - Confidential
 2 Q. Would you take messages with
 3 respect to females over the age of 18 to come
 4 over for a massage?
 5 A. I already testified I hardly ever
 6 did take messages.
 7 Q. But would you?
 8 A. I already testified, I hardly
 9 ever --
 10 Q. I know hardly ever, but did you?
 11 A. Over the course of time it is
 12 possible I may have taken a couple, I have no
 13 recollection. I hardly ever did and I did so
 14 irregularly that it would hard for me to
 15 pinpoint.
 16 Q. Did you ever take a message for a
 17 female under the age of 18 to come over for a
 18 massage or for any other reason to be with
 19 Jeffrey Epstein?
 20 MR. PAGLIUCA: Object to the form
 21 and foundation.
 22 A. I hardly ever took a message. I
 23 have absolutely no way of knowing, maybe one
 24 of my friends' daughters called to say they
 25 were coming to visit me. I have never taken

Page 164

1 G Maxwell - Confidential
 2 messages, I don't know about how I would
 3 possibly know if somebody I spoke to, one or
 4 two times I took a message is, how old they
 5 would be but I have never taken a message
 6 where I was aware of anything being under the
 7 age of 18 and I probably took it so
 8 infrequently, it would be impossible.
 9 Q. Can you turn to [REDACTED] it
 10 should be the next page.
 11 A. Uh-huh.
 12 Q. Do you see at the top, it says, for
 13 Mr. J. 11/8/04 and then the name is
 14 redacted. It says, I have a female for him.
 15 Why would a minor be calling
 16 Jeffrey to say they have a female for him?
 17 Do you know?
 18 MR. PAGLIUCA: Objection to the
 19 form and foundation.
 20 A. First of all, I don't know that's a
 21 minor, I don't know who took the message.
 22 Q. I will represent to you these are
 23 police reports and minor's names have to be
 24 redacted for privacy purposes?
 25 MR. PAGLIUCA: Objection to the

Page 165

1 G Maxwell - Confidential
 2 form and foundation.
 3 Q. Do you know why a minor child would
 4 be calling Jeffrey and leaving a message to
 5 say, quote, I have a female for him?
 6 MR. PAGLIUCA: Objection to the
 7 form and foundation.
 8 A. I can't testify anything about this
 9 message, I don't know anything about it.
 10 Q. I'm going to direct your attention
 11 to the next page [REDACTED]. If you look at
 12 the bottom left, you are going to see a
 13 message for Jeffrey, from [REDACTED], it
 14 says she doesn't have a number and left a
 15 message that she called.
 16 Do you know who [REDACTED] is?
 17 A. I do not.
 18 Q. Do you know that [REDACTED] was
 19 13 at the time she placed this call to
 20 Jeffrey?
 21 A. I don't know who [REDACTED] is.
 22 Q. Would Jeffrey regularly have 13
 23 year olds call and leave messages?
 24 MR. PAGLIUCA: Objection to the
 25 form and foundation.

Page 166

1 G Maxwell - Confidential
 2 A. How would I possibly, these were
 3 messages taken when I was not at the house
 4 and I have no idea who they are nor how old
 5 they are nor anything.
 6 Q. How do you know you weren't at the
 7 house on this day?
 8 A. I was hardly at the house in 2005.
 9 Q. So you could have been there, you
 10 just don't know?
 11 A. In the five days I might have been
 12 there in 2005, I suppose it's possible but
 13 it's unlikely.
 14 MR. PAGLIUCA: Do you know why this
 15 isn't redacted if you are representing
 16 all the names of people who are underage
 17 have been redacted from these records.
 18 MS. McCAWLEY: I think it was -- my
 19 assumption is it was a miss by the
 20 police department.
 21 Q. I will direct your attention to [REDACTED]
 22 [REDACTED] so you will skip a page and go back,
 23 it's the final page in the message pads and
 24 you will see on the top left for Jeffrey, on
 25 6/1/2005 from Jean Luc Brunel with a phone

Page 167

1 G Maxwell - Confidential
 2 number. It says, quote, He has a teacher for
 3 you to teach you how to speak Russian. She
 4 is two times eight years old. Not blond.
 5 Lessons are free and you can have your first
 6 today if you call.
 7 Do you know whether Jean Luc Brunel
 8 sent a Russian girl that was 16 years old
 9 over to Jeffrey Epstein's home?
 10 MR. PAGLIUCA: Objection to the
 11 form and foundation.
 12 A. I do not know.
 13 Q. Did you ever observe a Russian girl
 14 that was 16 years old come to Jeffrey
 15 Epstein's home?
 16 A. I am not aware of any 16 year old
 17 Russian girl that I can recall in Jeffrey
 18 Epstein's home.
 19 Q. Do you know whether Jeffrey Epstein
 20 had sex with a 16 year old Russian girl?
 21 MR. PAGLIUCA: Objection to the
 22 form and foundation.
 23 A. I do not know.
 24 THE VIDEOGRAPHER: It's 12:25.
 25 This will be the end of disk 3, we are

Page 168

1 G Maxwell - Confidential
 2 off the record.
 3 (Recess.)
 4 AFTERNOON SESSION
 5 (Time noted: 1:21 p.m.)
 6 GHISLAINE MAXWELL,
 7 resumed and testified as follows:
 8 EXAMINATION BY (Cont'd.)
 9 MS. McCAWLEY:
 10 THE VIDEOGRAPHER: It's now 1:21,
 11 we're starting disk No. 4. We are back
 12 on the record.
 13 Q. Ms. Maxwell, before the break, we
 14 were talking about and I think it's one of
 15 the exhibits that's marked in front of you,
 16 I'm not sure of the number, but the police
 17 report that I showed you earlier today.
 18 Now that you have knowledge of the
 19 police report and the criminal investigation
 20 with respect to Jeffrey Epstein, do you
 21 believe that Jeffrey Epstein abused any minor
 22 children?
 23 MR. PAGLIUCA: Objection to the
 24 form and foundation.
 25 A. Can you repeat the question please

Page 169

1 G Maxwell - Confidential
 2 and break it down so it's more
 3 understandable.
 4 Q. Now that you have the police report
 5 that I showed you this morning that you had
 6 an opportunity to look at.
 7 A. You gave it to me, I did not look
 8 at it.
 9 Q. The questions that I asked you
 10 about the police report -- you are aware
 11 there is a police report?
 12 A. I am aware there is a police
 13 report.
 14 Q. You are aware there was a criminal
 15 investigation of Jeffrey Epstein?
 16 A. I am aware that there was that.
 17 Q. Now that you are aware of those two
 18 things and having talked to Jeffrey Epstein,
 19 do you believe Jeffrey Epstein sexually
 20 abused minors?
 21 MR. PAGLIUCA: Objection to the
 22 form and foundation.
 23 A. Can you reask the second part of
 24 that question please.
 25 Q. Sure. The two documents we were

Page 242

1 G Maxwell - Confidential
 2 please?
 3 Q. Is it an obvious lie that you had
 4 sex toys in Jeffrey Epstein's Palm Beach
 5 house?
 6 MR. PAGLIUCA: Objection to the
 7 form and foundation.
 8 A. Did Virginia say that?
 9 Q. I'm asking you a question.
 10 Is it an obvious lie that you had
 11 sex toys in Jeffrey Epstein's house?
 12 A. I don't recall any sex toys.
 13 Q. If someone said had you sex toys,
 14 would that be an obvious lie?
 15 MR. PAGLIUCA: Objection to the
 16 form and foundation.
 17 A. Like I said -- can you be more
 18 specific about the house or whatever, what
 19 exactly you are referring to, what's a sex
 20 toy?
 21 Q. Yes. How would you define a sex
 22 toy?
 23 A. No. I need you to define a sex
 24 toy, I don't have enough knowledge of sex
 25 toys.

Page 243

1 G Maxwell - Confidential
 2 Q. I will define it based on the
 3 dictionary's definition, which is an object
 4 or device used to sexually stimulate or
 5 enhance sexual pleasure.
 6 A. What's your question, please?
 7 Q. The question is, is it an obvious
 8 lie that you had sex toys in Jeffrey
 9 Epstein's Palm Beach house?
 10 MR. PAGLIUCA: Same objection.
 11 Q. You can answer.
 12 A. Like I said, I do not have any
 13 recollection of sex toys in Jeffrey's house.
 14 Q. Is it a lie, is it an obvious lie
 15 that you took pictures of nude girls?
 16 MR. PAGLIUCA: Object to the form
 17 and foundation.
 18 A. We already covered this. Girls we
 19 are not referring to -- I can only testify to
 20 taking pictures of adult people and I already
 21 testified they are not nude, per se. That
 22 every picture that I ever took and which they
 23 were very limited, always by request, the
 24 people would be covered or it would be a hand
 25 or a foot. There was never any pictures that

Page 244

1 G Maxwell - Confidential
 2 I took of people would only have been
 3 mainstream type magazine type photos and any
 4 photos I took could have been very happily
 5 and expected to be displayed on your parents'
 6 mantel piece or grandparents' mantel piece.
 7 Q. Is it a lie that you approached
 8 females to bring them to Jeffrey Epstein?
 9 MR. PAGLIUCA: Objection to the
 10 form and foundation.
 11 A. Please ask the question, again.
 12 Q. Sure. Is it a lie that you
 13 approached females to bring them to Jeffrey
 14 Epstein?
 15 A. I don't know what you are asking
 16 me.
 17 Q. I'm asking you, if it's a lie that
 18 you approached females to bring them to
 19 Jeffrey Epstein?
 20 MR. PAGLIUCA: Objection to the
 21 form and foundation.
 22 A. You are not asking me a good
 23 question, sorry.
 24 Q. You don't get to choose the
 25 questions.

Page 245

1 G Maxwell - Confidential
 2 A. I would like to answer your
 3 questions but you are not asking me a
 4 question that I can answer.
 5 Q. What about that is causing you
 6 pause where you can't answer the question?
 7 A. You are trying to trap me and
 8 that's not fair, so I already testified that
 9 I hire people across the board, so I would
 10 hire architects, decorators, pool people,
 11 exercise instructors, gardeners, cooks,
 12 chefs, cleaning people. So I, in the course
 13 of a very long time when I would hire people
 14 I hired people to work for Jeffrey. So I'm
 15 happy to testify to hiring people for every
 16 possible conceivable proper job that you
 17 could conceive of within the context of
 18 Jeffrey's life and homes.
 19 Q. Is it a lie that you approached
 20 females to bring them to Jeffrey Epstein for
 21 the purpose of performing massages?
 22 MR. PAGLIUCA: Objection to the
 23 form and foundation.
 24 A. Again, I have already testified
 25 that part of the job that I had was to hire

Page 250

1 G Maxwell - Confidential
 2 agree to that?
 3 MR. PAGLIUCA: Objection to the
 4 form and foundation.
 5 Q. Are they under the age of 18?
 6 A. We already established that you can
 7 be a masseuse in Florida at age 17. That
 8 does not make it inappropriate.
 9 A. I'm not saying appropriate or
 10 inappropriate. I'm just asking if there were
 11 any exercise instructors that were under the
 12 age of 18.
 13 A. I am not aware if anybody was but I
 14 don't want to full out and say you oh she
 15 said, we already established you can be a 17
 16 year old masseuse and have it not be
 17 something that is not appropriate. So when
 18 you say that and then you go, well, you come
 19 back and say something, now we can establish
 20 that Virginia was 17 but you can be a 17 year
 21 old legal masseuse, but I am not aware to
 22 your point.
 23 Q. Who were the other 17 year old
 24 masseuses that you were aware of?
 25 A. I am not aware of any.

Page 251

1 G Maxwell - Confidential
 2 Q. Were there any 16 year year old
 3 masseuse that you are aware of?
 4 A. I am not aware.
 5 Q. Any 15?
 6 A. I just want to be clear. The only
 7 person that I am aware of who claims to have
 8 been a -- we have to -- we established
 9 Virginia now is 17, given she has changed her
 10 age so many times. The only person that I am
 11 aware of that was a masseuse at the time when
 12 I was present in the house was Virginia.
 13 Q. Is it an obvious lie that Jeffrey
 14 Epstein had a sexual preference for underage
 15 minors?
 16 MR. PAGLIUCA: Objection to the
 17 form and foundation.
 18 A. Can you ask the question again?
 19 Q. It is it an obvious lie that
 20 Jeffrey Epstein had a sexual preference for
 21 underage minors?
 22 MR. PAGLIUCA: Objection to the
 23 form and foundation.
 24 A. Can you ask the question again?
 25 Q. Is it an obvious lie that Jeffrey

Page 252

1 G Maxwell - Confidential
 2 Epstein had a sexual preference for underage
 3 minors?
 4 MR. PAGLIUCA: Object to the form
 5 and foundation.
 6 A. I cannot testify to what
 7 Jeffrey's --
 8 Q. You don't know his preference?
 9 A. You handed me a stack of papers
 10 from the police reports and that's what I've
 11 read but I have no knowledge, direct
 12 knowledge, of what you are referencing.
 13 Q. So you don't know, you don't know
 14 in your own mind that Jeffrey Epstein had a
 15 sexual preference for underage minors, is
 16 that correct?
 17 MR. PAGLIUCA: Objection to the
 18 form and foundation.
 19 Q. Is that correct?
 20 A. Please ask the question again.
 21 Q. You don't know in your own mind
 22 that Jeffrey Epstein had a sexual preference
 23 for underage minors?
 24 MR. PAGLIUCA: Objection to the
 25 form and foundation. You have to pause,

Page 253

1 G Maxwell - Confidential
 2 let me object, answer the question.
 3 Listen to her question, pause, I object,
 4 you answer.
 5 Q. So you don't know in your own mind
 6 that Jeffrey Epstein had a sexual preference
 7 for underage minors?
 8 MR. PAGLIUCA: Objection to the
 9 form and foundation.
 10 Q. You can answer.
 11 A. I cannot tell you what Jeffrey's
 12 story is. I'm not able to.
 13 Q. Did Jeffrey Epstein have a scheme
 14 to recruit underage girls to use them for
 15 purposes of sexual massages?
 16 MR. PAGLIUCA: Objection to the
 17 form and foundation.
 18 A. Can you ask me again, please?
 19 Q. Did Jeffrey Epstein have a scheme
 20 to recruit underage girls to recruit them for
 21 sexual massages?
 22 MR. PAGLIUCA: Objection to the
 23 form and foundation.
 24 A. Can you ask it a different way?
 25 Q. Did Jeffrey Epstein have a scheme

Page 254

1 G Maxwell - Confidential
 2 to recruit underage girls for sexual
 3 massages?
 4 MR. PAGLIUCA: Objection to the
 5 form and foundation.
 6 Q. If you know.
 7 A. I don't know what you are talking
 8 about.
 9 Q. Is it an obvious lie that Virginia
 10 Giuffre was a minor the first time she was
 11 taken to Jeffrey Epstein's house?
 12 MR. PAGLIUCA: Objection to the
 13 form and foundation.
 14 A. So we've already established that
 15 Virginia was 17 and we have established that
 16 her mother brought her to the house and that
 17 she came as a masseuse, age 17, which is
 18 legal in Florida.
 19 Q. Would Jeffrey Epstein's assistants
 20 arrange times for underage girls to come to
 21 the house for sexual massages?
 22 MR. PAGLIUCA: Objection to the
 23 form and foundation.
 24 A. What are you talking about?
 25 Q. Sure. Would Jeffrey Epstein's

Page 255

1 G Maxwell - Confidential
 2 assistants, I think earlier you mentioned, we
 3 talked about Sarah Kellen who worked in the
 4 role as an assistant or Nadia Marcinkova.
 5 Would Jeffrey Epstein's assistants arrange
 6 times for underage girls to come over the
 7 house for sexual massages?
 8 MR. PAGLIUCA: Objection to the
 9 form and foundation.
 10 A. Again, I read the police reports so
 11 this is all happening according to the police
 12 reports when I am no longer at the house so I
 13 can't testify to what Jeffrey's assistants
 14 did when this kind of activity as alleged in
 15 the reports.
 16 Q. So you don't know?
 17 A. No.
 18 Q. Would Jeffrey Epstein's assistants,
 19 meaning Sarah Kellen, Nadia Marcinkova or any
 20 other assistant that you are aware of from
 21 the time you worked there take nude
 22 photographs of underage girls?
 23 MR. PAGLIUCA: Object to the form
 24 and foundation.
 25 A. During what period of time?

Page 256

1 G Maxwell - Confidential
 2 Q. During any period of time you
 3 worked, did you observe that?
 4 A. I did not observe any such
 5 photographs.
 6 Q. Are you aware if they took those
 7 kinds of photos?
 8 A. I am not aware.
 9 MR. PAGLIUCA: Can we take a
 10 five-minute break.
 11 THE VIDEOGRAPHER: It's 2:58 and we
 12 are off the record.
 13 (Recess.)
 14 THE VIDEOGRAPHER: It's now 3:10.
 15 We're starting disk No. 6 and we are
 16 back on the record.
 17 Q. Ms. Maxwell, was it an obvious lie
 18 when Virginia said she was sent to Thailand
 19 by Epstein in September of 2002?
 20 MR. PAGLIUCA: Objection to the
 21 form and foundation.
 22 A. I have no knowledge of Virginia
 23 being sent to Thailand.
 24 But may I say something?
 25 Q. There is not a question pending

Page 257

1 G Maxwell - Confidential
 2 unless you want to clarify something.
 3 Did you want to clarify that?
 4 A. No, I just wanted to say something.
 5 Q. Is it an obvious lie when Virginia
 6 said she was given instructions to maintain
 7 telephone contact with you while she was in
 8 Thailand?
 9 MR. PAGLIUCA: Objection to the
 10 form and foundation.
 11 A. Can you repeat the question?
 12 Q. Is it an obvious lie when Virginia
 13 said she was given instructions to maintain
 14 telephone contact with you when she was in
 15 Thailand?
 16 MR. PAGLIUCA: Same objection.
 17 A. I have no idea what instructions
 18 Virginia was given, if any, when she went to
 19 Thailand.
 20 Q. So you know she went to Thailand?
 21 A. I know she claimed she went to
 22 Thailand from having read it but given that
 23 she lied about everything it's hard to know
 24 what is true and not true.
 25 Q. Would it make any sense for her to

Page 266

1 G Maxwell - Confidential
 2 can see the dates.
 3 MR. PAGLIUCA: Can you identify a
 4 Bates number, please.
 5 Q. [REDACTED], which was at the top says,
 6 [REDACTED]. I'm going to refer you,
 7 at the same time, to the flight logs which
 8 were marked, the thicker document that looks
 9 like this with all the log entries on it.
 10 I'm going to refer you to page --
 11 MR. PAGLIUCA: That's Exhibit No.
 12 6, correct? I'm trying to keep the
 13 record straight.
 14 MS. McCAWLEY: I don't have Exhibit
 15 numbers on mine. That's Giuffre [REDACTED].
 16 MR. PAGLIUCA: Hang on one second.
 17 A. Can you repeat the number please.
 18 Q. [REDACTED]. And if you will look on
 19 that page at the entry, under [REDACTED]
 20 [REDACTED] starting with the [REDACTED] and then it runs
 21 down to the, looks like the [REDACTED], that first
 22 entry has President Clinton, Kevin Spacey,
 23 Chris Tucker, Jeffrey Epstein and the
 24 initials GM.
 25 Do you remember taking a trip with

Page 267

1 G Maxwell - Confidential
 2 President Clinton during September of 2002?
 3 MR. PAGLIUCA: Objection to the
 4 form and foundation.
 5 A. Can you repeat the question,
 6 please?
 7 Q. Do you remember taking a trip with
 8 President Clinton during September of 2002,
 9 that's the 21st, it looks like, through the
 10 27th?
 11 A. I don't remember the dates. I
 12 couldn't testify to when we actually did it
 13 but I do remember the trip itself.
 14 Q. So you were traveling with Jeffrey
 15 Epstein and President Clinton at the same
 16 time Virginia was headed to Thailand, is that
 17 correct?
 18 MR. PAGLIUCA: Objection to the
 19 form and foundation.
 20 A. I don't know, is that right?
 21 Q. If you look at September 27 on the
 22 document that I gave you, the first document
 23 and then you referred to, if you look in the
 24 same as above lines, you will see the travel
 25 group with President Clinton?

Page 268

1 G Maxwell - Confidential
 2 MR. PAGLIUCA: Are you asking her
 3 to compare the documents or are you
 4 asking her what her personal knowledge
 5 is.
 6 MS. McCAWLEY: I'm asking if she can
 7 look at the doubts and tell me if she
 8 recalls that she traveling with
 9 President Clinton at the same time this
 10 document reflects Virginia was in
 11 Thailand.
 12 A. I can't testify to any dates. I
 13 couldn't tell you. I can see a date and I
 14 can see a date but I can't tell you that I
 15 have a memory of the dates. I have a memory
 16 of the trip, I don't have a memory of the
 17 time.
 18 Q. Who is [REDACTED]?
 19 A. [REDACTED].
 20 Q. What is her address?
 21 A. I don't know.
 22 Q. Does she live in the United States?
 23 A. She does.
 24 Q. In what state?
 25 A. I believe in New Jersey somewhere.

Page 269

1 G Maxwell - Confidential
 2 Q. Do you have her phone number?
 3 A. Not memorized.
 4 Q. Do you have the ability to get her
 5 phone number?
 6 A. Of course.
 7 Q. Has she ever asked -- has [REDACTED]
 8 [REDACTED] ever asked other girls to come over to
 9 see Jeffrey Epstein for the purpose of a
 10 sexual massage?
 11 MR. PAGLIUCA: Objection to the
 12 form and foundation.
 13 A. Can you ask the question again
 14 please.
 15 Q. Has [REDACTED] ever asked girls to
 16 come over to see Jeffrey Epstein for the
 17 purpose of a sexual massage?
 18 MR. PAGLIUCA: Object to form and
 19 foundation.
 20 A. Can you ask again, please?
 21 Q. Has [REDACTED] ever asked girls to
 22 come over to see Jeffrey Epstein for the
 23 purpose of sexual massage?
 24 A. I have no personal knowledge.
 25 Q. What does [REDACTED] do for you?

Page 286

1 G Maxwell - Confidential
 2 moment there is such a document, just
 3 hypothetically, and assuming for the
 4 moment that it is going to get produced
 5 somewhere, if it hasn't already been
 6 produced, obviously that would involve a
 7 waiver, a future waiver of the
 8 privilege. I think that's the answer to
 9 the question.
 10 Q. Has the document been produced, do
 11 you know?
 12 A. You have everything that I have
 13 given you, so if you can't -- if it's not in
 14 those documents, I don't know what to tell
 15 you.
 16 Q. Your lawyers haven't withheld any
 17 documents?
 18 A. They are right here. You can ask
 19 them.
 20 Q. I'm asking you.
 21 A. I don't know what -- they're
 22 lawyers.
 23 Q. When we were talking earlier about
 24 Prince Andrew, I asked you whether you had
 25 ever given him a gift of a puppet.

Page 287

1 G Maxwell - Confidential
 2 Did you ever, not as a gift, did
 3 you ever see in the presence of Prince Andrew
 4 a puppet?
 5 MR. PAGLIUCA: Objection to the
 6 form and foundation.
 7 A. Can you be more direct, please?
 8 Q. Sure. Were you ever in a room with
 9 Prince Andrew where there was a puppet?
 10 MR. PAGLIUCA: Objection to the
 11 form and foundation.
 12 A. Can you be more specific please and
 13 can you bound it by time and be more
 14 specific, whatever you are actually asking
 15 me?
 16 Q. Were you ever in a room with Prince
 17 Andrew in New York in Jeffrey Epstein's home
 18 where there was a puppet?
 19 MR. PAGLIUCA: Objection to the
 20 form and foundation.
 21 A. What sort of puppet are you asking
 22 me?
 23 Q. Any kind of puppet?
 24 A. You need to be more descriptive. I
 25 don't know what you mean by puppet, there is

Page 288

1 G Maxwell - Confidential
 2 hand puppets, all sorts of puppets.
 3 Q. Is there any puppet you've ever
 4 seen in Jeffrey Epstein's home in the
 5 presence of Prince Andrew?
 6 A. Again, puppet, you know, there is
 7 lots of types of puppets.
 8 Q. Any type of puppet.
 9 A. If you want to give me a
 10 description of the puppet, I would be perhaps
 11 be able to say.
 12 Q. Any type of puppet?
 13 A. Can you be more detailed?
 14 Q. Have you ever seen a puppet in
 15 Jeffrey Epstein's home in the presence of
 16 Prince Andrew?
 17 A. My understanding of a puppet is a
 18 small handheld item you have in a circus. I
 19 have never seen that.
 20 Q. Have you ever seen a puppet which
 21 is defined as a movable model of a person or
 22 animal that is used in entertainment and
 23 typically moved either by strings or
 24 controlled from above or by a hand inside it?
 25 MR. PAGLIUCA: Objection to the

Page 289

1 G Maxwell - Confidential
 2 form and foundation.
 3 A. I have not seen a puppet that fits
 4 exactly that description.
 5 Q. Have you seen any puppet that fits
 6 any description?
 7 MR. PAGLIUCA: Objection to the
 8 form and foundation.
 9 A. Can you reask the question, please?
 10 Q. Yes.
 11 Have you seen any puppet that fits
 12 any description in the presence of Prince
 13 Andrew in Jeffrey Epstein's home?
 14 MR. PAGLIUCA: Objection to the
 15 form and foundation.
 16 A. I am not aware of any small
 17 handheld puppet that was there. There was a
 18 puppet -- not a puppet -- there was a -- I
 19 don't know how would you describe it really,
 20 I don't know how would you describe it. Not
 21 a puppet, I don't know how you would describe
 22 it. A caricature of Prince Andrew that was
 23 in Jeffrey's home.
 24 Q. Did you use that caricature to put
 25 the hand of the caricature on Johanna

Page 290

1 G Maxwell - Confidential
 2 Sjoberg's breast?
 3 MR. PAGLIUCA: Objection to the
 4 form and foundation.
 5 A. I don't recollect. I recollect the
 6 puppet but I don't recollect anything around
 7 the puppet. You characterized puppet, I
 8 characterize it as, I don't know, as a
 9 characterization of Andrew.
 10 Q. Do you recollect asking Virginia
 11 Roberts to sit on Prince Andrew's lap with
 12 the caricature of Prince Andrew?
 13 A. I do not recollect that.
 14 Q. What do you remember about the
 15 caricature of the Prince Andrew caricature
 16 when you were in the presence of Prince
 17 Andrew, Virginia Roberts and Johanna Sjoberg?
 18 MR. PAGLIUCA: Objection to the
 19 form and foundation.
 20 A. I don't recollect the story as told
 21 by Johanna or Virginia. I don't even know
 22 who -- I remember the caricature of Prince
 23 Andrew and I remember Prince Andrew but I
 24 don't recall anything else around the
 25 caricature.

Page 291

1 G Maxwell - Confidential
 2 Q. Did you give it to him?
 3 A. I did not.
 4 Q. Who gave it to him?
 5 A. I don't think it was given to him
 6 at all.
 7 Q. Did he bring it?
 8 A. No.
 9 Q. Was it something that was at the
 10 house?
 11 A. As best I recollect.
 12 Q. Was it something that you saw at
 13 the house in advance of Prince Andrew's
 14 arrival?
 15 A. Again, I don't real -- I recollect
 16 the caricature, I recollect Prince Andrew, I
 17 don't recollect much else around the
 18 caricature.
 19 Q. Was there a party going on in the
 20 house at the time you recollect the
 21 caricature?
 22 MR. PAGLIUCA: Objection to the
 23 form and foundation.
 24 A. You have to be way more specific?
 25 Q. Do you remember, you said you

Page 292

1 G Maxwell - Confidential
 2 recollect this caricature, you recollect
 3 Prince Andrew being there. Do you recollect
 4 a party going on at the time of that
 5 interaction with Prince Andrew and the
 6 caricature?
 7 MR. PAGLIUCA: Objection to the
 8 form and foundation.
 9 A. I don't recollect a party -- first
 10 of all, they weren't really parties -- I
 11 don't recollect a party -- I don't know what
 12 you mean by party in the context of that
 13 scenario.
 14 Q. Who do you recollect being at the
 15 home during the time Prince Andrew was there
 16 with this caricature?
 17 MR. PAGLIUCA: Objection to the
 18 form and foundation.
 19 A. I only recollect myself with Prince
 20 Andrew, I don't recollect anybody else.
 21 Q. You don't recollect Jeffrey Epstein
 22 being there?
 23 A. Actually, no.
 24 Q. You don't recollect Johanna Sjoberg
 25 being there?

Page 293

1 G Maxwell - Confidential
 2 A. No.
 3 Q. You don't recollect Virginia
 4 Roberts being there?
 5 A. No.
 6 Q. It was just you and Prince Andrew?
 7 A. I am not saying it was just me and
 8 Prince Andrew, you are asking me do you
 9 remember. I only remember Prince Andrew, I
 10 remember Prince Andrew and the caricature but
 11 I can't place the caricature and everybody
 12 else in the same context, the same timeframe
 13 you are asking me.
 14 Q. Would Prince Andrew typically
 15 travel with Secret Service or some sort of
 16 security when he would come to visit you and
 17 Jeffrey in New York?
 18 A. Typically he would have somebody.
 19 Q. Would they be in the house or
 20 outside of the house? Would they usually
 21 stay in the house or outside of the house, in
 22 other words guarding the doors or would they
 23 come inside?
 24 MR. PAGLIUCA: Objection to the
 25 form and foundation.

Page 302

1 G Maxwell - Confidential
 2 he and Virginia Roberts were together in the
 3 presence of Prince Andrew?
 4 MR. PAGLIUCA: Objection to the
 5 form and foundation.
 6 A. I can't speak to what Jeffrey would
 7 say.
 8 Q. Has he talked to about Virginia
 9 Roberts' statement that she was in the
 10 presence of Prince Andrew?
 11 MR. PAGLIUCA: Objection to the
 12 form and foundation.
 13 A. I have not discussed individual
 14 presences with Virginia. That's not -- I'm
 15 only concerned with what I know to be the
 16 stuff about me. So my focus has always been
 17 the lies and the obvious lies as something I
 18 can personally attest to. I cannot possibly
 19 talk for anything else.
 20 Q. Has Jeffrey Epstein said to you
 21 anything along the lines of Virginia is lying
 22 when she says she met Prince Andrew?
 23 MR. PAGLIUCA: Objection to the
 24 form and foundation.
 25 A. Again, I'm not talking about what

Page 303

1 G Maxwell - Confidential
 2 she says as regards to other people. I can
 3 talk to things as regards to me.
 4 Q. I'm asking if Jeffrey ever said
 5 that to you?
 6 A. I don't recollect specific
 7 conversations along those things.
 8 Q. You don't recollect him saying that
 9 to you?
 10 A. I don't recollect him saying to me
 11 that Virginia didn't meet Prince Andrew. I'm
 12 sure that wouldn't be a conversation that we
 13 would have. It doesn't effect me whether --
 14 so I'm really only concerned about the lies
 15 that were told as regards to me.
 16 Q. Can Jeffrey Epstein confirm or deny
 17 whether you sent Virginia to give Glenn Dubin
 18 a massage?
 19 MR. PAGLIUCA: Objection to the
 20 form and foundation.
 21 A. I can't say what Jeffrey would say,
 22 I can tell you I didn't. I can't tell you
 23 what anybody else.
 24 Q. Have you discussed with him
 25 Virginia's allegation that she gave Glenn

Page 304

1 G Maxwell - Confidential
 2 Dubin a massage?
 3 MR. PAGLIUCA: Objection to the
 4 form and foundation.
 5 A. I didn't know that she did say
 6 that.
 7 Q. Do you know whether Jeffrey Epstein
 8 has ever sent anybody to Glenn Dubin to
 9 perform a massage for him?
 10 MR. PAGLIUCA: Objection to the
 11 form and foundation.
 12 A. I couldn't possibly recollect
 13 whether he did anything like that.
 14 Q. Did you ever send anybody, not
 15 Virginia, anybody else over to Glenn Dubin's
 16 home for a massage?
 17 A. Not to the best of my knowledge.
 18 Q. Do you know one of Alexander
 19 Dixon's friend by the name of Anuska
 20 DiGeorgio?
 21 A. I do recollect a person of that
 22 name.
 23 Q. How do you know her?
 24 A. I don't recollect.
 25 Q. Did you meet her through Jeffrey?

Page 305

1 G Maxwell - Confidential
 2 A. I don't recollect.
 3 Q. Do you recall when you met her?
 4 A. I do not recollect.
 5 Q. How many times have you seen Anuska
 6 DiGeorgio in your life?
 7 A. The only reason I remember is
 8 because it's an unusual name but I couldn't
 9 tell you anything else.
 10 Q. You didn't see her on a regular
 11 basis, she wasn't one of your friends?
 12 A. No.
 13 Q. Was Anuska DiGeorgio a masseuse?
 14 A. Not to my knowledge.
 15 Q. Do you have knowledge of whether
 16 she had a sexual relationship with Jeffrey
 17 Epstein?
 18 A. I have no knowledge of that.
 19 Q. When was the last time you spoke
 20 with her?
 21 A. A very long -- I have no idea.
 22 Q. Would it be years?
 23 A. Yes.
 24 Q. What do you remember about Anuska
 25 DiGeorgio?

Page 306

1 G Maxwell - Confidential
 2 A. Nothing really.
 3 Q. Do you remember what she looks
 4 like?
 5 A. I would just be speculating on how
 6 I remember. I couldn't describe her.
 7 Q. Do you recall traveling with her?
 8 A. I don't.
 9 Q. Did you ever go to her home?
 10 A. I don't believe I did.
 11 Q. Do you know where she lives?
 12 A. I don't.
 13 Q. Would you have met her through
 14 Jeffrey Epstein?
 15 MR. PAGLIUCA: Objection to the
 16 form and foundation.
 17 A. I already testified I don't
 18 recollect how I met her and I remember her
 19 because her name is very unusual.
 20 Q. So what's your -- what recollection
 21 do you have of her, do you have a specific
 22 recollection of meeting her somewhere, you
 23 just don't know when that was or how do you
 24 know that name Anuska DiGeorgio?
 25 MR. PAGLIUCA: Objection to the

Page 307

1 G Maxwell - Confidential
 2 form and foundation.
 3 A. I don't know why the name is -- I'm
 4 sorry -- I can't -- I have no idea. I
 5 recognize the name but that's it.
 6 Q. Was Johanna Sjoberg a masseuse?
 7 MR. PAGLIUCA: Objection to the
 8 form and foundation.
 9 A. What are you asking me, I'm sorry?
 10 Q. When Johanna Sjoberg worked for
 11 Jeffrey Epstein, did she perform massages?
 12 A. I've testified that when Johanna
 13 came originally, she came to answer
 14 telephones. I believe at some point she
 15 became a masseuse. I don't recollect when
 16 and I personally had massages from Johanna.
 17 Q. What did Johanna do for Jeffrey
 18 Epstein, did she perform massages, anything
 19 else?
 20 MR. PAGLIUCA: Objection to the
 21 form and foundation.
 22 A. When she came she answered phones
 23 and at some point, I believe, I don't have
 24 any firm recollection, but I believe she went
 25 to school and became a masseuse and I had

Page 308

1 G Maxwell - Confidential
 2 massages from her.
 3 Q. Did you ever have any sexual
 4 interaction with her?
 5 MR. PAGLIUCA: Object to the form
 6 and foundation and I'm going to instruct
 7 you if we're talking about any
 8 consensual adult contact, you are not
 9 allowed to answer the question.
 10 Q. Did you have any sexual contact
 11 with her in the presence of Jeffrey Epstein?
 12 MR. PAGLIUCA: Same instruction.
 13 Q. Did you have any sexual contact
 14 with her in the presence of anybody other
 15 than Jeffrey Epstein?
 16 MR. PAGLIUCA: Same instruction.
 17 Q. How many massages did you receive
 18 from Johanna?
 19 A. I really don't recall but a fair
 20 amount.
 21 Q. Did the massages involve sex?
 22 MR. PAGLIUCA: I'm going to
 23 instruct you not to answer.
 24 Q. Have you ever engaged in sex with
 25 any female?

Page 309

1 G Maxwell - Confidential
 2 MR. PAGLIUCA: I'm going to
 3 instruct you not to answer.
 4 MS. McCRAWLEY: I want the record to
 5 reflect that Ms. Maxwell's attorney is
 6 directing her not to answer this series
 7 of questions.
 8 MR. PAGLIUCA: It definitely does.
 9 Q. Were you responsible for
 10 introducing Anuska to Jeffrey Epstein?
 11 MR. PAGLIUCA: Objection to the
 12 form and foundation.
 13 A. I already testified that I don't
 14 really recall Anuska.
 15 Q. Were you responsible for
 16 introducing Johanna to Jeffrey Epstein?
 17 MR. PAGLIUCA: Objection to the
 18 form and foundation.
 19 A. Again, I don't like the
 20 characterization of introduction. Johanna
 21 came to answer telephones.
 22 Q. When did you -- were you the person
 23 who brought or introduced or met Johanna for
 24 purposes of bringing her to Jeffrey Epstein's
 25 home?

Page 310

1 G Maxwell - Confidential
 2 MR. PAGLIUCA: Objection to the
 3 form and foundation.
 4 A. That's not how I would characterize
 5 that.
 6 Q. How would you characterize it?
 7 A. I have testified that I'm
 8 responsible for finding professional people
 9 to work in the homes, age appropriate adult
 10 people, so from pool attendants, to
 11 gardeners, to chefs, to housekeepers, to
 12 butlers, to chauffeurs and one of the
 13 functions was to be able to answer the
 14 telephones and in the context of finding
 15 someone to answer the telephones, I did look
 16 to try to find appropriate people to answer
 17 the phones.
 18 Q. So did you find Johanna for
 19 purposes of that role?
 20 A. So in the course of looking for
 21 somebody to answer phones at the house,
 22 Johanna was one of the people who said that
 23 she was willing to answer phones.
 24 Q. Did you approach her at her school
 25 campus?

Page 311

1 G Maxwell - Confidential
 2 MR. PAGLIUCA: Objection to form
 3 and foundation.
 4 A. I honestly don't recall how, in
 5 that moment, how I met Johanna and how she
 6 came to get the job but...
 7 Q. Did you typically, in your work for
 8 Jeffrey Epstein, would you typically go to
 9 school campuses to try to find individuals to
 10 work for Jeffrey Epstein?
 11 MR. PAGLIUCA: Objection to the
 12 form and foundation.
 13 A. I never -- what do you mean by
 14 school? Let's characterize school.
 15 Q. Any kind of school.
 16 A. Obviously not. I never went to any
 17 school with young people. Johanna, I believe
 18 came from an adult university, as I would
 19 know in England, so university, I went there
 20 but I never went, as I best recollect,
 21 anywhere else.
 22 Q. Did you -- what university was it
 23 that you went to?
 24 A. I don't recall the university that
 25 she went to right now.

Page 312

1 G Maxwell - Confidential
 2 Q. Would you visit more than one
 3 university to try to find individuals to work
 4 for Jeffrey Epstein?
 5 A. As I recollect, I think that's, in
 6 fact, the only university I went to.
 7 Q. Did you go there more than once?
 8 A. I think I went twice.
 9 Q. Who else did you find from that
 10 university, was there anybody other than
 11 Johanna?
 12 A. I don't recollect, I'm sorry.
 13 Q. We are going to mark this as
 14 Maxwell 13?
 15 (Maxwell Exhibit 13, documents,
 16 marked for identification.)
 17 Q. Can you take a look at the document
 18 I put in front of you, please.
 19 Are you familiar with this
 20 document?
 21 A. I'm familiar with this actual
 22 document.
 23 Q. How was this document created?
 24 MR. PAGLIUCA: Objection to the
 25 form and foundation.

Page 313

1 G Maxwell - Confidential
 2 A. I don't know how this document was
 3 created.
 4 Q. You were involved in the creation
 5 of this document?
 6 A. I think you can see from the date
 7 that it's 2004, 2005, so no.
 8 Q. You weren't involved in the
 9 creation of this document.
 10 Did you -- we talked earlier about
 11 Mr. Epstein's house, I'm talking about the
 12 Palm Beach house where you said there was a
 13 computer on the desk, that employees had
 14 access to -- people who worked for Jeffrey
 15 Epstein may have had access to?
 16 A. I think anybody could have had
 17 access to that.
 18 Q. Was that computer used, if you know
 19 to keep a log of addresses and phone contact
 20 information for Jeffrey Epstein?
 21 A. Are we talking about when this
 22 document was created.
 23 Q. In general, was there, on that
 24 computer during the time that you were
 25 present with Jeffrey Epstein, was there a

Page 314

1 G Maxwell - Confidential
 2 mechanism by which you kept electronic
 3 information of names and addresses of
 4 individuals that he knew?
 5 MR. PAGLIUCA: Objection to the
 6 form and foundation.
 7 A. I can't testify to what was on that
 8 computer or not after I was gone.
 9 Q. Not when you were gone, when you
 10 were there. If Jeffrey wanted to call, for
 11 example, say Les Wexner, would someone be
 12 able to go to that computer to pull up the
 13 address information and phone contact
 14 information for that individual?
 15 MR. PAGLIUCA: Objection to the
 16 form and foundation.
 17 A. I couldn't possibly say.
 18 Q. Did you ever have to keep track of
 19 address or phone contact information for
 20 Jeffrey Epstein?
 21 A. That was not my job.
 22 Q. Did you ever do it?
 23 A. I am not responsible for keeping
 24 his numbers so that wasn't my job at all.
 25 Q. But did you ever do it? I know

Page 315

1 G Maxwell - Confidential
 2 it's not your job but did you ever do it, did
 3 you ever keep phone contact information for
 4 him?
 5 A. During the course of the time we
 6 were together, if he gave me a telephone
 7 number, I would give it to an assistant to
 8 put in the computer, I could do that.
 9 Q. Would he ask you for contact
 10 information for different individuals, if he
 11 wanted to contact someone?
 12 MR. PAGLIUCA: Objection to the
 13 form and foundation.
 14 A. In the course of the long period of
 15 time when I was there, it certainly would be
 16 possible for him to ask me for a telephone
 17 number and if I had the -- I wouldn't always
 18 have it -- I'm sure it happened.
 19 Q. Was there a hardcopy book in
 20 addition to the computer, a hardcopy book
 21 that you could look for numbers that were
 22 relevant to Jeffrey Epstein's life and
 23 something on the computer or was it just an
 24 electronic version?
 25 MR. PAGLIUCA: Objection to the

Page 316

1 G Maxwell - Confidential
 2 form and foundation.
 3 Q. Was there a hard copy book as well
 4 as something on the computer or was there
 5 only electronic information on the phone
 6 numbers?
 7 MR. PAGLIUCA: Objection to the
 8 form and foundation.
 9 A. I can only testify to what I know
 10 obviously, and I believe that this is a copy
 11 of a stolen document. I would love to know
 12 how you guys got it.
 13 Q. I'm asking during the time you
 14 worked for Jeffrey Epstein, was there a
 15 hardcopy document of any kind that kept phone
 16 numbers for Jeffrey Epstein, if he needed to
 17 contact someone?
 18 A. The stolen document I have in front
 19 of me that you have is what you are referring
 20 to.
 21 Q. So there was, during your time when
 22 you were there, there was no other, you
 23 mentioned there was information on a
 24 computer. Was there any hardcopy document
 25 that you could refer to to find someone's

Page 317

1 G Maxwell - Confidential
 2 number?
 3 A. You have the stolen document in
 4 front of you.
 5 Q. You had access to this when you
 6 worked for Jeffrey Epstein?
 7 A. This is, I believe, the book that
 8 was stolen, that was the hardcopy of whatever
 9 was there.
 10 Q. So when you were working for
 11 Jeffrey Epstein, you were able to access this
 12 book?
 13 A. This book -- if this is what this
 14 is, I believe it was, this is the stolen
 15 document from his house.
 16 Q. And you were able to access it when
 17 you worked for him?
 18 A. It was a document that was printed
 19 that you could, if you needed to, look for a
 20 number.
 21 Q. Do you know how this book was
 22 created?
 23 A. No.
 24 Q. When you referred to it a moment
 25 ago, to a stolen document, when Alfredo

Page 318

1 G Maxwell - Confidential
 2 Rodriguez turned this document over to the
 3 FBI, are you aware he described it as a
 4 document that came from your computer?
 5 MR. PAGLIUCA: Objection to the
 6 form and foundation.
 7 A. I have no idea what he said or
 8 didn't say, so if you want me to reference
 9 something he said, you need to show it to me.
 10 Q. Did you keep this document, an
 11 electronic copy of it, on your personal
 12 computer?
 13 A. I don't recollect.
 14 Q. If you had to update something, for
 15 example, if there was a new number, a new
 16 individual that Jeffrey had hired that you
 17 were going to track, would you input that
 18 information into this document on your
 19 computer?
 20 MR. PAGLIUCA: Objection to the
 21 form and foundation.
 22 A. I've already testified that I'm not
 23 responsible for updating and keeping these
 24 records.
 25 Q. Did you have this document on your

Page 319

1 G Maxwell - Confidential
 2 computer, your personal computer?
 3 A. I told you, I don't recollect
 4 having this document on my computer.
 5 Q. Do you know what computers this
 6 document was on, if more than one?
 7 A. I'm sorry, this is a long time ago
 8 and I don't recall exactly how this was all
 9 managed.
 10 Q. If you didn't create this document,
 11 do you know who did?
 12 MR. PAGLIUCA: Objection to the
 13 form and foundation.
 14 A. I don't.
 15 Q. I'm going to direct your attention
 16 to part of this document. It's towards the
 17 back, it's going to be page 91 and it has
 18 bates label Giuffre 001663. I'm going to
 19 direct your attention to the section that
 20 says, Massage Florida.
 21 Did you input any of the names or
 22 numbers under that section?
 23 MR. PAGLIUCA: Objection to form
 24 and foundation.
 25 A. So this document is produced in

Page 320

1 G Maxwell - Confidential
 2 2004, 2005, so, no.
 3 Q. But I'm sorry, correct me if I'm
 4 misunderstanding your testimony, I thought
 5 you said when you were working with Jeffrey,
 6 that this document existed and it was
 7 something you utilized?
 8 A. I can't possibly tell you what
 9 numbers were added or not added subsequent to
 10 my departure.
 11 Q. So you can't recall if you added
 12 any of these numbers?
 13 MR. PAGLIUCA: Objection to the
 14 form and foundation, mischaracterizes
 15 the witness' testimony.
 16 Q. Are there any numbers on here or
 17 names that you recognize that you would have
 18 entered into this section?
 19 A. I already testified that I'm not
 20 responsible for inputting numbers and names
 21 into this so I would not be able to tell you.
 22 Q. Are there any names or numbers
 23 under this section, Massage Florida, that you
 24 would have provided to an assistant to input
 25 into this document?

Page 321

1 G Maxwell - Confidential
 2 A. I can't possibly say.
 3 Q. Do you see under Massage Florida,
 4 about halfway down the first column, do you
 5 see a number that says Johanna's cell?
 6 MR. PAGLIUCA: What page?
 7 Q. It's 91, Bates number 001663.
 8 About halfway down, it says in the first
 9 column, it says Johanna's cell.
 10 Do you see that?
 11 A. I do.
 12 Q. Would you have provided after, I
 13 know you didn't hire her, Jeffrey hired her
 14 but after you brought her to Jeffrey, would
 15 you have given her cell phone number to an
 16 assistant to input into this document?
 17 MR. PAGLIUCA: Objection to form
 18 and foundation.
 19 A. I didn't bring her to Jeffrey, the
 20 way you characterize and I would have no
 21 knowledge of how this number ended up in this
 22 book.
 23 Q. I believe you, and I will try to
 24 use your words so we are clear, you met
 25 Johanna, is that correct?

Page 322

1 G Maxwell - Confidential
 2 A. Yes.
 3 Q. And then she began working for
 4 Jeffrey?
 5 A. Yes.
 6 Q. Would you have provided whomever
 7 was in charge of keeping this updated with
 8 Johanna's cell number so you would be able to
 9 contact her if needed?
 10 MR. PAGLIUCA: Objection to the
 11 form and foundation.
 12 A. I don't know. It could have been a
 13 number of different ways, it it could have
 14 been Jeffrey who gave it to somebody.
 15 Q. You just don't remember doing that?
 16 A. I do not.
 17 Q. Now, as you look -- I want you to
 18 take a look at the Florida massage list, it's
 19 three columns there.
 20 Do you, as you look at those names
 21 on the various columns, do you know the ages
 22 of any of the girls in this list?
 23 A. I don't know. One, I don't know
 24 who all the people are on this list and I
 25 certainly don't know the ages.

Page 323

1 G Maxwell - Confidential
 2 Q. Do you know what their
 3 qualifications are?
 4 A. I don't know who the people are in
 5 general so of course I don't know what their
 6 qualifications are.
 7 Q. Do you know why Jeffrey has so many
 8 masseuses listed in Florida in his book here?
 9 MR. PAGLIUCA: Objection to the
 10 form and foundation.
 11 A. Again, this book was created post
 12 my departure, so I couldn't explain why all
 13 these people were here.
 14 Q. When you were there, you said this
 15 book existed?
 16 A. Yes.
 17 Q. So when you were there, were there
 18 a number of masseuses listed under the
 19 Florida massage?
 20 MR. PAGLIUCA: Objection to the
 21 form and foundation and
 22 mischaracterization of the witness'
 23 testimony.
 24 Q. I'm asking you a question.
 25 When you were there, were there a

Page 324

1 G Maxwell - Confidential
 2 number of masseuses listed under the Florida
 3 massage section?
 4 A. When I was there, I would have, of
 5 course there would have been some masseuses
 6 listed but I could not tell you who or how
 7 many and this -- I could not possibly because
 8 I wouldn't remember.
 9 Q. Do you know why Jeffrey would have
 10 had so many names listed under his massage
 11 Florida?
 12 MR. PAGLIUCA: Objection to form
 13 and foundation.
 14 A. I can't testify to why Jeffrey has
 15 so many.
 16 Q. Did he use a different masseuse
 17 every day?
 18 MR. PAGLIUCA: Objection to the
 19 form and foundation.
 20 Q. You can answer.
 21 A. When I was there he had a massage
 22 roughly every day, one masseuse, and mostly
 23 he would have them at random times, so it
 24 would be difficult if you just only had one
 25 person, man, woman, for an adult massage, to

Page 325

1 G Maxwell - Confidential
 2 come and be available for whatever time it
 3 was. So he would have more than one person
 4 that he could call for a massage because at
 5 any given time the one that he called first
 6 may not have been available.
 7 Q. So would it typically be a
 8 different person each day that would give him
 9 a massage?
 10 MR. PAGLIUCA: Objection to the
 11 form and foundation.
 12 A. It would be, when I was there,
 13 based on availability.
 14 Q. Would it surprise you to learn that
 15 the Federal Government found that some of the
 16 girls on this list under massage Florida were
 17 under the age of 18?
 18 MR. PAGLIUCA: Objection to the
 19 form and foundation.
 20 A. I can't testify to what the
 21 government found or did not find because I
 22 would have no knowledge of it.
 23 Q. I'm asking if you would be
 24 surprised by that?
 25 MR. PAGLIUCA: Form and foundation.

Page 326

1 G Maxwell - Confidential
 2 A. I have knowledge of it. I can't
 3 speculate.
 4 Q. On the second column, towards the
 5 bottom, there is the name, it's one up from
 6 the bottom, there is the name Gwendolyn Beck,
 7 do you know Gwendolyn Beck?
 8 A. I do.
 9 Q. Who is she?
 10 A. She was a friend of Jeffrey's.
 11 Q. Is she a masseuse?
 12 A. She, I don't think she was a
 13 masseuse, no.
 14 Q. Why would be she listed under
 15 Florida massages?
 16 A. An input error.
 17 Q. Is this list any individual that
 18 would have sex with Jeffrey?
 19 MR. PAGLIUCA: Objection to the
 20 form and foundation.
 21 A. I wouldn't have any knowledge of
 22 that.
 23 Q. Do you know if Jeffrey had sex with
 24 Gwendolyn Beck?
 25 MR. PAGLIUCA: Object to the form

Page 327

1 G Maxwell - Confidential
 2 and foundation.
 3 A. First of all, I wouldn't have any
 4 knowledge of that.
 5 MS. McCAWLEY: We are going to take
 6 a quick break.
 7 THE VIDEOGRAPHER: It's now 4:39
 8 and we are off the record.
 9 (Recess.)
 10 THE VIDEOGRAPHER: It's now 4:54
 11 and we are as back on the record
 12 starting disk number 8.
 13 Q. Ms. Maxwell, we were talking
 14 earlier about the journal and I believe you
 15 said in 2004, 2005, you were no longer
 16 working and responsible for that journal, is
 17 that correct?
 18 MR. PAGLIUCA: Objection to the
 19 form and foundation.
 20 A. What are we referring to, this
 21 document right here?
 22 Q. Yes.
 23 A. I don't know who is the author of
 24 this or I can't tell you what is in here
 25 versus what would have been here when I was

Page 328

1 G Maxwell - Confidential
 2 around. I can't testify to that.
 3 Q. Were you around in 2004, 2005?
 4 A. I already testified that I was
 5 there when Jeffrey's mother passed away and
 6 so you know, I did visit for her passing and
 7 I believe I was there for a couple of days in
 8 2005.
 9 Q. So if an employee of Mr. Epstein in
 10 2004 said that you were the employee's direct
 11 supervisor, would that be incorrect?
 12 MR. PAGLIUCA: Objection to form
 13 and foundation.
 14 A. What employee, what's the
 15 circumstances and what is the story, I don't
 16 know what you are asking me.
 17 Q. If Alfredo Rodriguez said in 2004
 18 when he was hired, you were his direct
 19 supervisor, would that be true?
 20 A. No.
 21 Q. Were you in 2004 supervising Sarah
 22 Kellen?
 23 MR. PAGLIUCA: Objection to form
 24 and foundation.
 25 A. I never supervised Sarah Kellen.

Page 329

1 G Maxwell - Confidential
 2 Q. Did Sarah Kellen take orders from
 3 you?
 4 MR. PAGLIUCA: Objection to the
 5 form and foundation.
 6 A. She worked for Jeffrey.
 7 Q. If Alfredo Rodriguez said you had
 8 knowledge of underage girls coming to
 9 Jeffrey's home for the purpose of sex, would
 10 you contend that that is truthful?
 11 MR. PAGLIUCA: Objection to the
 12 form and foundation of the question.
 13 A. I have no idea what you are talking
 14 about, I'm sorry.
 15 Q. If Alfredo Rodriguez said that you
 16 have knowledge of underage girls coming to
 17 Jeffrey's home for the purpose of having
 18 massages involving sex, would you say that
 19 that statement is truthful?
 20 MR. PAGLIUCA: Objection to the
 21 form and foundation.
 22 A. I can't testify to what Alfredo
 23 said or didn't say.
 24 Q. I'm saying if Alfredo said that you
 25 had knowledge that there were girls coming

Page 330

1 G Maxwell - Confidential
 2 over to the house that were underage for the
 3 purposes of sex, would that statement be
 4 true?
 5 MR. PAGLIUCA: Objection to form
 6 and foundation.
 7 A. I can't testify to what Alfredo
 8 said or didn't say or what he thought.
 9 Q. Did you have knowledge of underage
 10 girls coming to Jeffrey Epstein's house for
 11 the purpose of sex?
 12 A. No.
 13 Q. Earlier I believe you testified,
 14 correct me if I'm wrong, that the document
 15 that is in front of you, the thicker document
 16 was a stolen document.
 17 Do you know who stole that
 18 document?
 19 A. I have read that Alfredo stole the
 20 document.
 21 Q. And where have you read that?
 22 A. I believe it was reported in the
 23 press.
 24 Q. Earlier we were talking about the
 25 computers at Jeffrey Epstein's home. Did you

Page 331

1 G Maxwell - Confidential
 2 have a computer that was your computer
 3 located in Jeffrey Epstein's home?
 4 MR. PAGLIUCA: Objection to form
 5 and foundation.
 6 A. I've testified to the computer
 7 already. Even when I was around, there was a
 8 computer that people had access to.
 9 Q. So is Alfredo Rodriguez telling the
 10 truth when he says that he downloaded that
 11 book from your computer?
 12 MR. PAGLIUCA: Objection to the
 13 form and foundation.
 14 A. I couldn't possibly tell you what
 15 Alfredo did or didn't do or said or didn't
 16 say.
 17 Q. Was it on your computer?
 18 A. I already testified I have no idea
 19 where this document came from.
 20 Q. Did you have a list of names of
 21 individuals with contact information for
 22 Jeffrey Epstein on your personal computer?
 23 A. Again, that wasn't my computer. I
 24 already said that was a computer that lots of
 25 people would have, so I have no recollection

Page 332

1 G Maxwell - Confidential
 2 of this document being on it, so I don't know
 3 where this came from.
 4 Q. I understand the computer at the
 5 house that you're referencing. On a personal
 6 computer of yours, did you have that
 7 document?
 8 A. I don't know where this document
 9 came from, so I can't possibly say this
 10 document was on any computer that I may have
 11 had access to.
 12 Q. On a personal computer of your own,
 13 did you have lists of the phone numbers and
 14 contact information relating to Jeffrey
 15 Epstein?
 16 A. Like everybody, I have an address
 17 book but I can't possibly testify to where
 18 this thing came from.
 19 Q. Was it your address book or was it
 20 addresses that related to Jeffrey Epstein?
 21 MR. PAGLIUCA: Objection to the
 22 form and foundation.
 23 A. I don't know what you're asking me.
 24 Q. On your personal computer, the
 25 address book you are referencing, was it your

Page 333

1 G Maxwell - Confidential
 2 address book with individuals you knew or was
 3 it an address book for your employer, Jeffrey
 4 Epstein?
 5 A. Jeffrey has his situation and I
 6 have no -- this is Jeffrey's, it came from
 7 his home, so I can't testify to anything
 8 about this in that period of time.
 9 Q. So you didn't have on your computer
 10 a list of contact information for individuals
 11 that was related to Jeffrey Epstein?
 12 A. I don't recall exactly what I had
 13 back in 2004 and 2005, so I can't say what I
 14 had back then that relates to his addresses,
 15 I can't recall.
 16 Q. So is it possible that someone
 17 could have downloaded from your personal
 18 computer a list of names and address that
 19 were affiliated with Jeffrey Epstein?
 20 MR. PAGLIUCA: Objection to the
 21 form and foundation.
 22 A. This didn't come from any computer
 23 of mine.
 24 Q. But is it possible that someone
 25 could have downloaded a list of names and

Page 334

1 G Maxwell - Confidential
 2 addresses affiliated with Jeffrey Epstein
 3 from your computer?
 4 MR. PAGLIUCA: Objection to the
 5 form and foundation.
 6 A. I already said, I didn't have a
 7 computer there, so I don't know where this
 8 came from, I have no idea.
 9 Q. I'm going to read to you some
 10 testimony from Alfredo Rodriguez's deposition
 11 and it's on page 370 and I want to ask you a
 12 question about it, if it's true or false?
 13 MR. PAGLIUCA: I'm going to object
 14 unless you show the witness the
 15 document.
 16 MS. McCAWLEY: I will pass it. We
 17 are not going to mark it. We will skip
 18 it.
 19 Q. Did you ever tell Alfredo Rodriguez
 20 that he better watch out and better keep his
 21 mouth shut with respect to what occurred at
 22 Mr. Epstein's home?
 23 MR. PAGLIUCA: Objection to the
 24 form and foundation.
 25 A. It doesn't sound like anything I

Page 335

1 G Maxwell - Confidential
 2 would say.
 3 Q. Did you ever threaten Alfredo
 4 Rodriguez in any way if he were to disclose
 5 information he learned from his employment
 6 with Jeffrey Epstein?
 7 MR. PAGLIUCA: Objection to the
 8 form and foundation.
 9 A. I'm happy to answer. No, I never
 10 threatened him in any way.
 11 Q. Were you concerned that he was
 12 going to disclose that Jeffrey Epstein was
 13 trafficking underage girls?
 14 MR. PAGLIUCA: Objection to the
 15 form and foundation.
 16 A. First of all, there are so many
 17 things wrong with that question, but I have
 18 no knowledge of what you are talking about.
 19 Q. Have you ever contacted or
 20 instructed anyone to contact any witness in
 21 this case for the purposes of threatening
 22 them not to testify in this case?
 23 MR. PAGLIUCA: Objection to the
 24 form and foundation.
 25 A. I have never called anybody with

Page 336

1 G Maxwell - Confidential
 2 reference to this case with any, anything you
 3 just mentioned, I never threatened anyone.
 4 Q. Have you ever directed anyone to
 5 call any witnesses relevant to this case and
 6 threaten them not to testify?
 7 MR. PAGLIUCA: Objection to the
 8 form and foundation.
 9 A. I never done such a thing.
 10 Q. Did Jeffrey Epstein or you ever ask
 11 any female, regardless of age, to carry
 12 Jeffrey's baby for him?
 13 MR. PAGLIUCA: Objection to the
 14 form and foundation.
 15 Q. Or anything along those lines?
 16 MR. PAGLIUCA: Objection to the
 17 form and foundation.
 18 A. Can you repeat the question,
 19 please?
 20 Q. Did you or Jeffrey Epstein ever ask
 21 any female, regardless of age, to carry
 22 Jeffrey Epstein's baby for him?
 23 MR. PAGLIUCA: Objection to the
 24 form and foundation.
 25 A. Are you asking --

Page 337

1 G Maxwell - Confidential
 2 Q. To become pregnant, did you or
 3 Jeffrey Epstein ever ask any female to become
 4 pregnant and carry Jeffrey Epstein's baby for
 5 you or for Jeffrey?
 6 MR. PAGLIUCA: Objection to form
 7 and foundation.
 8 A. You need to be very specific. I
 9 have no idea what you are talking about.
 10 That's completely rubbish.
 11 Q. Did you or Jeffrey Epstein ask any
 12 female to become pregnant and carry his baby
 13 for either him or you?
 14 MR. PAGLIUCA: Objection to the
 15 form and foundation. Go ahead.
 16 A. I can't testify to anything Jeffrey
 17 did or didn't do when I am not present, but I
 18 have never asked anybody to carry a baby for
 19 me.
 20 Q. Or anything along those lines?
 21 MR. PAGLIUCA: Object to the form
 22 and foundation.
 23 Q. I want to make sure we are talking
 24 about the same thing, not physically carry a
 25 baby, I mean become pregnant with a baby?

Page 362

1 G Maxwell - Confidential
 2 lawsuit, is that correct?
 3 MR. PAGLIUCA: Objection to the
 4 form and foundation.
 5 A. I have legal advice that I took.
 6 Q. But you knew in early January by
 7 making a statement calling Virginia a liar
 8 that you were subjecting yourself to a legal
 9 dispute with her?
 10 MR. PAGLIUCA: Objection to the
 11 form and foundation.
 12 A. I took legal advice as to what
 13 should be said and not be said and the legal
 14 advice that came from the United Kingdom
 15 was --
 16 MR. PAGLIUCA: You are not allowed
 17 to talk about any legal advice that you
 18 got from anybody that's a lawyer.
 19 A. Sorry.
 20 Q. So is it correct without telling me
 21 what you talked to your lawyers about that
 22 you knew because this is dated January 10
 23 that when you made this statement in early
 24 January, January 2 of 2015 you knew that
 25 calling Virginia a liar would subject you to

Page 363

1 G Maxwell - Confidential
 2 a legal action, isn't that correct?
 3 MR. PAGLIUCA: Objection to the
 4 form and foundation. As to what you
 5 knew -- whatever she knows would be
 6 privileged.
 7 MS. McCRAWLEY: I'm asking if she
 8 knows. I'm not asking her to tell me
 9 about her privileged communications.
 10 A. All I can say is I asked a question
 11 and received legal advice.
 12 (Maxwell Exhibit 18, email, marked
 13 for identification.)
 14 Q. This is an email dated January 15,
 15 2015 from Jeffrey Epstein to you?
 16 A. Uh-huh.
 17 Q. It states in the first line, do you
 18 want [REDACTED] to come out and say she was the
 19 girlfriend during the time?
 20 MR. PAGLIUCA: Objection to the
 21 form and foundation of the question and
 22 actually the word is [REDACTED], there
 23 is no vowel in there.
 24 MS. McCRAWLEY: I was just trying to
 25 pronounce it.

Page 364

1 G Maxwell - Confidential
 2 Q. This email reads do you want
 3 [REDACTED], without a vowel, to come out and say
 4 she was the girlfriend during the time.
 5 Who was Jeffrey Epstein referring
 6 to?
 7 A. I believe he was referring to
 8 [REDACTED].
 9 Q. Why was he asking you if you wanted
 10 [REDACTED] to come out and say she was the
 11 girlfriend?
 12 MR. PAGLIUCA: Objection to the
 13 form and foundation.
 14 A. The way the press and you were
 15 characterizing me is I was with Jeffrey
 16 throughout this entire period of time and I
 17 was not.
 18 Q. Was [REDACTED] with Jeffrey during this
 19 period of time?
 20 A. I believe she was.
 21 Q. Did Jeffrey come out and tell the
 22 press it was [REDACTED] and not you that was with
 23 him as he is proposing here?
 24 A. I don't believe he did.
 25 Q. Did you want him to do that?

Page 365

1 G Maxwell - Confidential
 2 A. No, I didn't ask him to do
 3 anything. No.
 4 Q. So do you know in January of 2015,
 5 was [REDACTED] his girlfriend?
 6 A. 2015, I have no idea who was his
 7 girlfriend in 2015.
 8 Q. I'm sorry, you are correct.
 9 In the period of 1999 to 2002, was
 10 [REDACTED] his girlfriend?
 11 A. They spent a lot of time together.
 12 Q. Did you talk to [REDACTED] about going
 13 to the press and saying that she was the
 14 girlfriend and not you?
 15 A. I have never spoken to [REDACTED].
 16 Q. Was [REDACTED] offered any money to
 17 make a statement that she was the girlfriend?
 18 MR. PAGLIUCA: Objection to the
 19 form and foundation.
 20 A. I have no idea. I have never
 21 spoken to [REDACTED] and I don't know anything --
 22 I have no idea.
 23 (Maxwell Exhibit 19, email, marked
 24 for identification.)
 25 Q. That's an email from Jeffrey to

EXHIBIT E

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----x

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----x

May 18, 2016

9:04 a.m.

C O N F I D E N T I A L

Deposition of JOHANNA SJOBERG, pursuant to notice, taken by Plaintiff, at the offices of Boies Schiller & Flexner, 401 Las Olas Boulevard, Fort Lauderdale, Florida, before Kelli Ann Willis, a Registered Professional Reporter, Certified Realtime Reporter and Notary Public within and for the State of Florida.

1 in your view?

2 A. Yes.

3 Q. Did you ever -- did you at that time
4 wonder why she was traveling with Jeffrey?

5 A. At that time, I did not.

6 Q. Did you later wonder that?

7 A. Yes.

8 Q. And what was your impression?

9 MS. MENNINGER: Objection, vague,
10 speculative.

11 THE WITNESS: I -- we're jumping ahead; is
12 that okay?

13 BY MS. McCAWLEY:

14 Q. Yes, that's okay.

15 A. A few days later, I remember asking her
16 questions to try to figure out her role, why she was
17 there, and she gave me vague answers and was never
18 specific.

19 And so I thought perhaps she just was an
20 assistant, someone that did massages well. I wanted
21 to believe that she was innocent.

22 Q. Did you ever refer to her as being
23 orphan-like?

24 A. I did.

25 Q. And how did that come about?

1 And I can't recall if they were in the main living
2 areas.

3 Q. Did you see them in the stairwell up to
4 the second story of the house?

5 A. I can't recall.

6 Q. Do you know who -- who the people were in
7 those photos? Were you familiar with any of them?

8 A. No.

9 Q. Were you in any of those photos?

10 A. At one point, yes.

11 Q. And were you naked in that photo?

12 A. Topless.

13 Q. Do you recall seeing any naked photos of
14 Virginia Roberts?

15 A. I do not.

16 Q. Where did you go next, after the New York
17 visit?

18 A. I went to the Virgin Islands.

19 Q. And who told you that you would be going
20 to the Virgin Islands?

21 A. He asked me if I wanted to go, and I said
22 I would still like to go.

23 Q. And do you recall who you -- who went with
24 you to the Virgin Islands?

25 A. I believe -- well, I know Virginia was

1 leading.

2 THE WITNESS: Jeffrey Epstein; Ghislaine
3 Maxwell; AP and PK are the two women I do not
4 recall; Virginia Roberts; and myself.

5 BY MS. McCAWLEY:

6 Q. Do you recall how you flew back from the
7 location in the US Virgin Islands?

8 A. They put me on a commercial flight. I
9 wanted to be home in time for Easter.

10 Q. When you say "they," do you recall who
11 made those arrangements for you?

12 A. It could have been Ghislaine.

13 Q. Did you -- do you recall performing
14 massages while you were in the US Virgin Islands?

15 A. Yes.

16 Q. Who was involved in -- was there more than
17 one?

18 A. Yes. I massaged Ghislaine at one point.
19 And I massaged Jeffrey, Virginia and I, both, on the
20 beach.

21 Q. Were you dressed during the massage that
22 was on the beach?

23 A. Yes. Bikinis probably, most likely.

24 Q. Do you recall what Virginia was wearing?

25 A. I believe she was wearing a bathing suit,

1 Q. Did you ever see Ghislaine Maxwell during
2 that trip laying out by the pool?

3 A. There was one time where we were all by
4 the pool, yes.

5 Q. Was Ghislaine Maxwell ever nude or topless
6 by the pool?

7 A. I don't recall. She was nude when she
8 went swimming in the ocean.

9 Q. At that moment in the USVI home, did you
10 observe any photos there of nude females?

11 A. I don't recall.

12 Q. Besides Virginia, who you mentioned, you
13 observed to be young, did you observe any other
14 females that in your view appeared to be essentially
15 under the age of 18?

16 A. No.

17 Q. Did you observe any females who you
18 thought looked young, younger than you?

19 A. No.

20 Q. Do you remember an individual by the name
21 of [REDACTED] that you met during your time with Jeffrey
22 Epstein?

23 A. In Palm Beach?

24 Q. Yes.

25 A. Yes.

1 A. Sarah Kellen was there. Ghislaine was
2 there. That's all I recall.

3 Q. Do you recall why you went on the trip to
4 New Mexico?

5 A. To work.

6 Q. Did you perform massages on that trip?

7 A. Yes.

8 Q. Did you -- do you recall whether you
9 performed massages with Sarah Kellen on that trip?

10 A. No.

11 Q. Do you recall in the New Mexico home ever
12 observing nude photos of females there?

13 A. I don't recall.

14 Q. When you would provide massages, would you
15 provide those massages naked?

16 A. On occasion.

17 Q. On average, would you be naked, if it was
18 100 percent of the time, more than 50 percent of the
19 time?

20 A. Can you repeat it?

21 Q. Sure. When you're performing the
22 massages, can you tell me -- you said on occasion.
23 Over the five years that you worked for him, how
24 often did you perform massages naked?

25 A. Somewhere between 25 and 50 percent of the

1 observed her personality to be?

2 A. Sure. She definitely had a great sense of
3 humor, she loved making jokes. I mean, in a very
4 British way. I don't remember her ever laughing,
5 but she was funny.

6 And I remember just thinking, she -- the
7 first weekend that we flew to the Virgin Islands,
8 she flew the helicopter from Saint, wherever we were
9 to little Saint Jeff [sic] or whatever the name of
10 the island was, and I just thought, wow, who is this
11 woman.

12 Q. Would you say that you respected her?

13 A. Yes.

14 Q. When you ended up getting in the car with
15 her and this other woman and going back to the
16 house, who was driving the car?

17 A. She was driving.

18 Q. And where did she take you?

19 A. She took me to the house in Palm Beach.

20 Q. And can you describe the house in Palm
21 Beach?

22 A. Sure. It's at the end of El Brillo Way,
23 on the Intracoastal. The house was either white or
24 pink. It was pink at one time it may have been
25 painted. It was nothing fancy, it was large, it was

1 something. That's all I recall.

2 Q. Did you go anywhere with Virginia?

3 A. Oh, my gosh, yes. We went to Phantom of
4 the Opera.

5 Q. Who else went?

6 A. I think it was just she and I. I forgot
7 about that. Thank you for that memory.

8 Q. It's my job.

9 Anything else you remember about that day
10 in New York?

11 A. No.

12 Q. You said you had given a massage to
13 Jeffrey while you were there on that trip or was it
14 a subsequent trip?

15 A. That trip.

16 Q. And how did that come to be?

17 A. Either he or somebody asked me to go and
18 do it. Someone showed me to the room, but I don't
19 remember who it was.

20 Q. Can you describe that room?

21 A. Yes. It was high ceilings, dark. There
22 were, like, dark red walls or dark blue walls or
23 dark blue carpeting or something. It had a massage
24 table set up in the middle, and there was a large --
25 I want to say like a 15-foot photo, either photo or

1 Q. Do you know personally whether anyone else
2 had said no to him?

3 A. No.

4 Q. Did anyone ever tell you that they had
5 been in a massage scenario and told him no?

6 A. No.

7 Q. Do you recall when in your trip the
8 massage occurred?

9 A. Well, it was not the day we landed. It
10 must have been that next day that we were there.

11 Q. Do you remember anything else about
12 Virginia from that trip other than the Prince Andrew
13 thing and Phantom of the Opera?

14 A. Well, we were getting ready to leave to go
15 to the airport, and we were waiting. She and I sat
16 on the steps in the foyer. I do remember just kind
17 of asking a few questions to try to understand her
18 role, because at that point now I knew what he
19 wanted from me in the massage. And -- but she did
20 not make it clear to me that she was participating
21 in that. So I was prodding gently to see if there
22 was anything happening that shouldn't have been,
23 because I was getting the impression that she was --
24 she told me she was 17.

25 Q. She told you she was 17?

1 A. Uh-huh.

2 Q. How did that come up?

3 A. I asked her.

4 Q. Was anyone else present during this
5 conversation?

6 A. No.

7 Q. You mentioned in your earlier testimony
8 that she seemed orphan-like.

9 A. Yes.

10 Q. But you said that was something you had
11 said to Ms. McCawley, correct?

12 A. Correct.

13 Q. That was not said at the time?

14 A. Right. No. At the time I was getting an
15 impression that she did not have a family or she had
16 walked away from her family. And it seemed to me,
17 you know, they had just sort of adopted her, not as
18 a child, but they would take care of her.

19 Q. Did you observe anyone speaking to her as
20 a child, like make up your bed?

21 A. No.

22 Q. Did you observe whether she was using
23 drugs during that trip?

24 A. No.

25 MS. McCAWLEY: Objection.

1 celebration or cake with candles. It was just
2 another day.

3 Q. You said that the Virgin Islands were a
4 part of that second trip, as well?

5 A. Yes.

6 Q. And do you remember Ghislaine being part
7 of the Virgin Islands the second time?

8 A. Yes. That's when she called -- went to
9 bed and kissed us all on the head and called us her
10 children.

11 Q. Who were the other participants in that
12 session?

13 A. That's who -- I don't recall who was
14 there. I want to say that [REDACTED] was.

15 Q. But Virginia was not there?

16 A. Virginia was not there.

17 Q. Do you recall the point in time in which
18 Virginia went away?

19 A. Sort of. After the trip to New York, I
20 was given her phone number to call. And I remember
21 one time I tried to get ahold of her. Her boyfriend
22 answered. A boyfriend, I would assume, and he
23 sounded like he was high. And I couldn't find out
24 where she was. And then from there on, she was out
25 of the picture.

1 Q. Do you recall how long after the New York
2 trip that occurred?

3 A. I would say it was probably within a month
4 or two.

5 Q. Did she tell you she was working
6 elsewhere?

7 A. No.

8 Q. Did you ask her?

9 A. No.

10 Q. Did she mention that she was a waitress?

11 A. No.

12 Q. And worked at Taco Bell?

13 A. Huh-huh.

14 Q. Did you speak to her boyfriend or a
15 boyfriend at any other time associated with her?

16 A. No.

17 Q. Did you meet her boyfriend?

18 A. No.

19 Q. Her fiancé?

20 A. No.

21 MS. McCAWLEY: Objection.

22 BY MS. MENNINGER:

23 Q. When you were on the plane with Jeffrey
24 during these two trips, he was present on all of
25 those flights?

1 A. Yes.

2 Q. Did you observe any sexual behavior
3 happening on the plane?

4 A. No. He told me a story of something that
5 had happened one time.

6 Q. Did it involve Ghislaine Maxwell?

7 A. No.

8 Q. Did it involve Virginia Roberts?

9 A. No.

10 Q. And you didn't see anything?

11 A. No.

12 Q. You did give massages to Ghislaine
13 Maxwell, correct?

14 A. Yes.

15 Q. On how many occasions?

16 A. Maybe somewhere between five and 10.

17 Q. Was that over the course of the five
18 years?

19 A. Yes.

20 Q. Was there some point during that five
21 years where Ghislaine Maxwell was not around as
22 much?

23 A. Yes.

24 Q. Do you recall when that was?

25 A. In the middle.

1 Q. Did you know why that might be?

2 A. No.

3 Q. Is that about the time that you started
4 seeing [REDACTED] more frequently?

5 A. Yeah, I guess she was probably in the
6 picture more. Her and Sarah both had kind of been
7 around the most.

8 Q. Did you observe [REDACTED] or Sarah appearing
9 to act like Jeffrey's girlfriend?

10 A. [REDACTED], not Sarah.

11 Q. What did you observe?

12 A. She was just very loving, kissing him.

13 Q. Did you know how old she was?

14 A. I didn't know.

15 Q. So you gave massages to Ghislaine five or
16 10 times. Was there anything unusual about those
17 massages?

18 A. No.

19 Q. You've been quoted in the press perhaps as
20 saying that she wasn't very picky?

21 A. About massage?

22 Q. About her massages.

23 A. Not like Jeffrey, I guess. I mean, saying
24 that meant that, you know, I would do whatever I
25 wanted to do in the massage; whereas, Jeffrey was,

1 like, Do my foot, do my leg. He would kind of
2 narrate what he wanted. She just wanted a massage.
3 So if that makes sense.

4 Q. She may have been naked under a towel --

5 A. Definitely.

6 Q. -- in a regular massage fashion?

7 MS. McCAWLEY: Objection.

8 THE WITNESS: Yes. Actually, I do recall
9 an instance where I was massaging her and
10 Jeffrey came into the room and he did something
11 sort of sexual to her, whether it was fondling
12 her or slapping her butt or something, and she
13 brushed him off like she was embarrassed.

14 BY MS. MENNINGER:

15 Q. So she never asked you to touch her in a
16 sexual manner, correct?

17 A. No.

18 Q. And she did not rub her breasts on you,
19 for example?

20 A. No.

21 MS. McCAWLEY: Objection.

22 BY MS. MENNINGER:

23 Q. She did not demand that you perform oral
24 sex on her?

25 A. No.

1 Q. Did she did not demand that you undress
2 during your massages?

3 A. No.

4 Q. There was nothing from her that was sexual
5 during the massages that you gave to her?

6 MS. McCAWLEY: Objection.

7 THE WITNESS: Correct.

8 BY MS. McCAWLEY:

9 Q. Do you recall when the last time you gave
10 her a massage was?

11 A. I don't recall.

12 Q. Do you recall meeting with her in about
13 2006 when she was in town for some helicopter
14 training?

15 A. I do recall that.

16 Q. Do you recall giving her some massages
17 during that period?

18 A. Yes.

19 Q. Do you remember going out to dinner with
20 her and to a movie?

21 A. I remember to a movie, and I don't
22 remember if we went to dinner. I remember her
23 cooking dinner. That was another way she impressed
24 me: She knew how to cook like a chef. She had done
25 some culinary training.

1 Q. And you guys had a normal type
2 conversation?

3 A. Yes. It was very fun.

4 MS. McCAWLEY: Objection.

5 MS. MENNINGER: I would like to take about
6 a 5-, to 10-minute break, if that's okay.

7 THE VIDEOGRAPHER: Off the record at
8 11:05.

9 (Thereupon, a recess was taken, after
10 which the following proceedings were held:)

11 THE VIDEOGRAPHER: This is the beginning
12 of Disk 2. On the record at 11:25.

13 BY MS. MENNINGER:

14 Q. Hi. I believe when we left off I was
15 asking you about massages that you gave to
16 Ghislaine.

17 Did Ghislaine pay you when she got a
18 message from you?

19 A. Yes.

20 Q. Do you know how much she paid you?

21 A. I believe it was 200. It was the going
22 rate.

23 Q. The same as you were getting paid by
24 Jeffrey, correct?

25 A. Yes.

1 Q. How much?

2 A. One hundred dollars extra.

3 Can I clarify?

4 Q. Absolutely.

5 A. He didn't ever say he would pay me more,
6 but when the massage was more than just a massage
7 and it was sexual, then he would pay me more.

8 Q. It wasn't a discussion; it's just what
9 happened?

10 A. Correct.

11 Q. Thank you for clarifying.

12 The things that took place with you and
13 Jeffrey behind closed doors were when you were a
14 consenting adult, correct?

15 A. Yes.

16 MS. McCAWLEY: Objection.

17 THE WITNESS: Correct.

18 BY MS. MENNINGER:

19 Q. And you did not have knowledge of what
20 took place with other women behind closed doors and
21 Jeffrey, correct?

22 MS. McCAWLEY: Objection.

23 THE WITNESS: Correct.

24 BY MS. MENNINGER:

25 Q. Do you recall giving an interview to a

1 reporter from the Mail on Sunday?

2 A. Yes.

3 Q. You told that reporter, I believe, that
4 the police report painted a picture that it was a
5 big orgy all the time, but it wasn't?

6 A. What I saw, I did not see anything out in
7 the open sexually. Me, personally.

8 Q. Right. You did not see orgies happening
9 in the pool, for example?

10 A. No.

11 Q. You did not see people engaging in sexual
12 conduct out in the open areas of the home, correct?

13 A. Right.

14 MS. McCAWLEY: Objection.

15 BY MS. MENNINGER:

16 Q. When you became aware of the allegations
17 against Jeffrey, those came as a surprise to you,
18 correct?

19 MS. McCAWLEY: Objection.

20 THE WITNESS: Correct.

21 BY MS. MENNINGER:

22 Q. And the surprise was that it involved
23 underaged girls making that allegation, correct?

24 MS. McCAWLEY: Objection.

25 THE WITNESS: Correct.

1 BY MS. MENNINGER:

2 Q. You were asked some questions with
3 Ms. McCawley about nude photographs that were
4 present in the home? Homes?

5 A. Uh-huh.

6 Q. In Palm Beach, I believe you said there
7 were some in the room where the massage table was?

8 A. Yes.

9 Q. Can you tell me what you recall seeing?

10 A. It wasn't candid photos. They were all,
11 like, staged.

12 Q. Like a model?

13 A. Yes. And my -- I don't recall necessarily
14 knowing any of the people in those photos. I
15 remember at one point there was a photo of myself,
16 but...

17 Q. Were they fully frontally nude or were
18 they staged, like, with, you know, parts of bodies
19 showing?

20 A. I really only remember topless photos. I
21 don't remember full frontal photos.

22 Q. So exposing the breasts, but not exposing
23 the genitalia?

24 A. Not that I recall. And Ghislaine's
25 bathroom, I believe there was a photo of her

1 topless, or a painting.

2 Q. A painting?

3 A. Uh-huh.

4 Q. Did you see any nude or semi-clad photos
5 of young girls?

6 A. No.

7 Q. Preteens, for example?

8 A. No.

9 Q. Something you would consider child
10 pornography?

11 A. Never.

12 Q. Other than in the bathroom or the massage
13 room at the Palm Beach home, do you recall any other
14 place in the Palm Beach home where you saw any of
15 these topless photos of women?

16 A. I remember there being photos everywhere,
17 and the ones that stick out in my memory are the
18 ones -- there was a photo of Ghislaine with the
19 Pope. It would not surprise me if there were naked
20 photos around. I just didn't retain them in my
21 memory.

22 Q. So when you say there were photos
23 everywhere, you mean just photos in general?

24 A. Yes. They had a lot of photos around the
25 house.

1 MS. McCAWLEY: Objection.

2 BY MS. MENNINGER:

3 Q. And Ghislaine was not topless in a photo
4 with the Pope, just so I'm clear?

5 A. Correct.

6 Q. I just want to make sure we get that
7 record really clear.

8 So you recall there being photos
9 everywhere; you just remember a couple sticking out
10 in your brain as being topless?

11 A. Yes.

12 Q. And the walls on the staircase to the
13 upstairs were not just covered with nude
14 photographs, to your recollection?

15 A. To my recollection, I just -- I don't
16 remember.

17 Q. Did you observe what you would consider to
18 be child pornography on any computer in the home?

19 A. No.

20 Q. Did you observe anyone taking photographs
21 of young girls in the home?

22 A. No.

23 Q. The photograph of yourself that you saw,
24 was that something that you had posed for?

25 A. Not, like, professionally. But I was just

1 sitting, and I believe Jeffrey took the photo. I
2 was just sitting on a couch upstairs in the
3 bathroom.

4 Q. It wasn't taken by a hidden camera?

5 A. No. No. I was smiling in the picture.

6 Q. And, likewise, in the New York home, did
7 you see anything -- you described a large painting
8 or a photograph that was in the massage room?

9 A. Yes.

10 Q. Do you recall any other photos of
11 semi-clad or naked females?

12 A. I don't recall.

13 Q. Anything that you would consider to be
14 child pornography that you saw in the New York home?

15 A. No.

16 Q. And, likewise, in New Mexico?

17 A. I don't recall.

18 Q. Do you recall seeing any semi-clad photos
19 in New Mexico at all?

20 A. I do not recall.

21 Q. And the Virgin Islands?

22 A. Yes, in his bathroom, master bathroom.

23 Q. And what do you recall, if anything, about
24 that photo?

25 A. There was a photo of me in there.

1 A. Right.

2 Q. And an increase corresponding to massages
3 you were giving to guests, correct?

4 A. Yes.

5 Q. Did any of the guests for whom you gave a
6 massage mention that they expected something sexual?

7 A. No.

8 Q. Did they ask you to engage in sexual
9 contact and you refused?

10 MS. McCAWLEY: Objection.

11 THE WITNESS: No.

12 BY MS. MENNINGER:

13 Q. Marvin Minsky?

14 A. I don't know that.

15 Q. George Lucas?

16 A. No.

17 Q. Donald Trump?

18 A. No.

19 Q. Did you ever massage Donald Trump?

20 A. No.

21 Q. Sorry, I have to ask, but did you ever
22 have sex with Alan Dershowitz in the back of a
23 limousine with Virginia and Jeffrey present?

24 MS. McCAWLEY: Objection.

25 THE WITNESS: Absolutely not.

1 BY MS. MENNINGER:

2 Q. Do you know who Alan Dershowitz is?

3 A. I do.

4 Q. You would remember --

5 A. I would remember that.

6 Q. Did you ever see Virginia Roberts with any
7 of the people that I just asked you about?

8 A. No.

9 Q. Did Virginia ever talk to you about having
10 been with any of those people?

11 MS. McCAWLEY: Objection.

12 THE WITNESS: No.

13 BY MS. MENNINGER:

14 Q. Did she tell you that she had met any of
15 those people?

16 A. No.

17 Q. I believe you saw in that police report a
18 reference to a friend of Jeffrey named Glenn and his
19 wife?

20 A. Uh-huh.

21 Q. Do you remember them?

22 A. Vaguely.

23 Q. Tell me what you remember.

24 A. I remember they had an apartment in -- on
25 Breakers Row. I went up there and massaged. It may

1 have been more than once, but I only really remember
2 one time. But there was nothing sexual.

3 Q. Neither with the wife, nor with Glenn?

4 A. Right.

5 Q. Do you remember the apartment?

6 A. I only remember that I had to carry my
7 massage table up some stairs.

8 Q. So you actually gave the massage on a
9 massage table?

10 A. Yes.

11 Q. Does that help you place it in time as to
12 when that might have occurred? In other words --

13 A. Well --

14 Q. -- did you get your massage license at
15 some point and a massage table?

16 MS. McCAWLEY: Objection.

17 THE WITNESS: Yes. He bought me my
18 massage table around the time that I went to
19 massage school. So it could have been any time
20 after. If I thought really hard, I could
21 remember when I went to school. But it -- I
22 want to say it's around 2003.

23 BY MS. MENNINGER:

24 Q. Nothing sexual happened with Glenn?

25 A. No.

1 Q. Did Glenn ask you to give him a massage on
2 the floor of the home?

3 A. I don't recall.

4 Q. Did you ever discuss Glenn with Virginia?

5 A. Not to my recollection.

6 Q. Did you ever go to Virginia's home?

7 A. No.

8 Q. Do you know where she lived?

9 A. No.

10 Q. Did she talk about it?

11 A. Not that I remember.

12 Q. Did you see anything in your interactions
13 with Virginia that led you to believe that she was a
14 sex slave?

15 MS. McCAWLEY: Objection.

16 THE WITNESS: No.

17 BY MS. MENNINGER:

18 Q. Did you see anyone forcing her to remain
19 in the home?

20 A. No.

21 Q. Did you see her look traumatized at some
22 point?

23 MS. McCAWLEY: Objection.

24 THE WITNESS: No.

25

1 BY MS. MENNINGER:

2 Q. Did you see anything that led you to
3 believe Virginia Roberts had been trafficked,
4 sexually trafficked to third parties?

5 MS. McCAWLEY: Objection.

6 THE WITNESS: No.

7 BY MS. MENNINGER:

8 Q. Did Virginia ever tell you that she had
9 been trafficked?

10 A. No.

11 MS. McCAWLEY: Objection.

12 BY MS. MENNINGER:

13 Q. Did you hear anyone direct Virginia
14 Roberts to go have sex with someone?

15 A. No.

16 Q. Did Jeffrey ever ask you to go have sex
17 with another person?

18 A. No.

19 Q. Did Ghislaine Maxwell ever ask you to go
20 have sex with another person?

21 A. No.

22 Q. Did Ghislaine Maxwell ever ask you to give
23 a massage to someone else?

24 A. No.

25 Q. Did Ghislaine Maxwell ever ask you to

1 Q. Okay. That's fine.

2 A. Yeah, sure.

3 Q. If it doesn't, it doesn't. I'm just
4 asking.

5 Did Virginia say anything to you about
6 having met Prince Andrew before this time in New
7 York?

8 MS. McCAWLEY: Objection.

9 THE WITNESS: She did not say.

10 BY MS. MENNINGER:

11 Q. Did Prince Andrew say or do anything that
12 led you to believe that he had met Virginia prior to
13 that time?

14 A. I don't recall.

15 Q. Did you ever see Al Gore on the island?

16 A. No.

17 Q. Did you see his wife, Tipper Gore, on the
18 island?

19 A. No.

20 Q. What is your understanding of what the
21 lawsuit we are here today is about?

22 A. I understand that Ghislaine is calling
23 Virginia a liar, and so Ghislaine is suing Virginia.
24 I'm sorry. Strike that. Reverse it.

25 Right, Virginia is suing Ghislaine for

1 always covered himself with a towel.

2 Q. I believe I asked this, but I just want to
3 clarify to make sure that I did: Did Maxwell ever
4 ask you to bring other girls over to -- for Jeffrey?

5 A. Yes.

6 Q. Yes?

7 A. Yes.

8 Q. And what did you -- did you do anything in
9 response to that?

10 A. I did bring one girl named [REDACTED] --
11 no. [REDACTED] -- it was some girl named [REDACTED]
12 that I had worked with at a restaurant. And I
13 recall Ghislaine giving me money to bring her over;
14 however, they never called her to come.

15 Q. And then I believe you mentioned that one
16 of your physical fitness instructors, you brought a
17 physical fitness instructor; was that correct?

18 A. Correct.

19 Q. And what did she do?

20 A. She gave him a -- like a training session,
21 twice.

22 Q. Twice.

23 Did anything sexual in nature happen
24 during the session?

25 A. At one point he lifted up her shirt and

1 exposed her bra, and she grabbed it and pulled it
2 down.

3 Q. Anything else?

4 A. That was the conversation that he had told
5 her that he had taken this girl's virginity, the
6 girl by the pool.

7 Q. Okay. Did Maxwell ever say to you that it
8 takes the pressure off of her to have other girls
9 around?

10 A. She implied that, yes.

11 Q. In what way?

12 A. Sexually.

13 Q. And earlier Laura asked you, I believe, if
14 Maxwell ever asked you to perform any sexual acts,
15 and I believe your testimony was no, but then you
16 also previously stated that during the camera
17 incident that Maxwell had talked to you about not
18 finishing the job.

19 Did you understand "not finishing the job"
20 meaning bringing Jeffrey to orgasm?

21 MS. MENNINGER: Objection, leading, form.

22 BY MS. McCAWLEY:

23 Q. I'm sorry, Johanna, let me correct that
24 question.

25 What did you understand Maxwell to mean

1 expected to have sexual intercourse with Jeffrey?

2 A. Yes.

3 Q. And when was that?

4 A. 2005.

5 MS. McCAWLEY: That's it. I just do want
6 to also put on the record that we're
7 designating the testimony as confidential under
8 the protective order.

9 F U R T H E R E X A M I N A T I O N

10 BY MS. MENNINGER:

11 Q. Okay. You just testified that you have
12 knowledge -- you had knowledge that -- of what
13 Jeffrey was doing behind closed doors with other
14 girls. Was that your testimony?

15 A. Based on what he had told me.

16 Q. Okay. So Jeffrey told you things that he
17 had done with other girls?

18 A. Yes.

19 Q. You did not observe any of those things?

20 A. No.

21 Q. You did not talk to any of those girls
22 about what they had done with Jeffrey behind closed
23 doors?

24 MS. McCAWLEY: Objection.

25

1 Q. When I say "girl," I really mean women,
2 correct?

3 A. Correct.

4 Q. There were other women around who hung out
5 with Jeffrey, and you don't know what they did
6 behind closed doors, correct?

7 A. Correct.

8 Q. So when you heard the implication that she
9 wanted other girls around to take the pressure off
10 of her sexually, in your mind that meant other adult
11 women that he had in his life, correct?

12 MS. McCAWLEY: Objection.

13 THE WITNESS: Correct, doing what I was
14 expected to do in a massage, you know.

15 BY MS. MENNINGER:

16 Q. Ghislaine didn't have anything to do with
17 you bringing this woman over for a physical workout
18 with Jeffrey, correct?

19 A. Correct.

20 Q. She asked you to bring another girl to
21 be -- to perform massages at the home?

22 A. Yes. Well, she was always asking if I
23 knew anyone else. And so I brought this one girl
24 that I didn't even know I worked with her at a
25 restaurant. So I didn't care what she thought of me

1 if anything happened. And so -- but it never turned
2 into anything.

3 Q. She was an adult?

4 A. She was an adult.

5 Q. Working at a restaurant with you?

6 A. Yes.

7 Q. What restaurant was that?

8 A. It's a restaurant that's closed. It's
9 called BD's Mongolian Barbecue.

10 Q. You were asked about the famous people.
11 You said you met Michael Jackson?

12 A. Yes.

13 Q. But you did not give him a massage?

14 A. No.

15 Q. There were other famous people, perhaps,
16 who were around Jeffrey's home that you didn't meet,
17 correct?

18 A. Correct.

19 Q. Do you know whether Virginia Roberts has
20 told the truth about the age she was when she met
21 Ghislaine Maxwell?

22 MS. McCAWLEY: Objection. Exceeds the
23 scope of cross.

24 THE WITNESS: I don't have any idea what
25 she told them in terms of her age.