

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

██████████,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

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**PLAINTIFF'S FIRST SET OF INTERROGATORIES  
TO DEFENDANT GHISLAINE MAXWELL**

Plaintiff, by and through her undersigned counsel, hereby propounds Plaintiff's First Set of Interrogatories to Defendant Ghislaine Maxwell, pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and Local Rule 33. The responses are due at the offices of Boies, Schiller & Flexner LLP, 401 East Las Olas Boulevard, Suite 1200, Fort Lauderdale, Florida 33301, within thirty (30) days of service hereof.

**DEFINITIONS**

Wherever they hereafter appear the following words and phrases have the following meanings:

1. "Agent" shall mean any agent, employee, officer, director, attorney, independent contractor or any other person acting, or purporting to act, at the discretion of or on behalf of another.
2. "Correspondence" or "communication" shall mean all written or verbal communications, by any and all methods, including without limitation, letters, memoranda, and/or electronic mail, by which information, in whatever form, is stored, transmitted or

received; and, includes every manner or means of disclosure, transfer or exchange, and every disclosure, transfer or exchange of information whether orally or by document or otherwise, face-to-face, by telephone, teletypes, e-mail, text, modem transmission, computer generated message, mail, personal delivery or otherwise.

3. “Defendant” shall mean the defendant Ghislaine Maxwell and her employees, representatives or agents.

4. “Document” shall mean all written and graphic matter, however produced or reproduced, and each and every thing from which information can be processed, transcribed, transmitted, restored, recorded, or memorialized in any way, by any means, regardless of technology or form. It includes, without limitation, correspondence, memoranda, notes, notations, diaries, papers, books, accounts, newspaper and magazine articles, advertisements, photographs, videos, notebooks, ledgers, letters, telegrams, cables, telex messages, facsimiles, contracts, offers, agreements, reports, objects, tangible things, work papers, transcripts, minutes, reports and recordings of telephone or other conversations or communications, or of interviews or conferences, or of other meetings, occurrences or transactions, affidavits, statements, summaries, opinions, tests, experiments, analysis, evaluations, journals, balance sheets, income statements, statistical records, desk calendars, appointment books, lists, tabulations, sound recordings, data processing input or output, microfilms, checks, statements, receipts, summaries, computer printouts, computer programs, text messages, e-mails, information kept in computer hard drives, other computer drives of any kind, computer tape back-up, CD-ROM, other computer disks of any kind, teletypes, teletypes, invoices, worksheets, printed matter of every kind and description, graphic and oral records and representations of any kind, and electronic “writings” and “recordings” as set forth in the Federal Rules of Evidence, including but not

limited to, originals or copies where originals are not available. Any document with any marks such as initials, comments or notations of any kind of not deemed to be identical with one without such marks and is produced as a separate document. Where there is any question about whether a tangible item otherwise described in these requests falls within the definition of “document” such tangible item shall be produced.

5. “Employee” includes a past or present officer, director, agent or servant, including any attorney (associate or partner) or paralegal.

6. “Including” means including without limitations.

7. “Jeffrey Epstein” includes Jeffrey Epstein and any entities owned or controlled by Jeffrey Epstein, any employee, agent, attorney, consultant, or representative of Jeffrey Epstein.

8. “Massage” includes any person touching another person, and includes any person using any object, including sex toys, to touch, another person.

9. “Person(s)” includes natural persons, proprietorships, governmental agencies, corporations, partnerships, trusts, joint ventures, groups, associations, organizations or any other legal or business entity.

10. “Sex toys” shall mean any object or device used to sexually stimulate or enhance sexual pleasure.

11. “You” or “Your” hereinafter means Ghislaine Maxwell and any employee, agent, attorney, consultant, related entities or other representative of Ghislaine Maxwell.

### **INSTRUCTIONS**

1. Unless indicated otherwise, the Relevant Period for this Request is from July 1999 to the present. A Document should be considered to be within the relevant time frame if it

refers or relates to communications, meetings or other events or documents that occurred or were created within that time frame, regardless of the date of creation of the responsive Document.

2. This Request calls for the production of all responsive Documents in your possession, custody or control without regard to the physical location of such documents.

3. If any Document requested was in any defendant's possession or control, but is no longer in its possession or control, state what disposition was made of said Document, the reason for such disposition, and the date of such disposition.

4. For the purposes of reading, interpreting, or construing the scope of these requests, the terms used shall be given their most expansive and inclusive interpretation. This includes, without limitation the following:

- a) Wherever appropriate herein, the singular form of a word shall be interpreted as plural and vice versa.
- b) "And" as well as "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope hereof any information (as defined herein) which might otherwise be construed to be outside the scope of this discovery request.
- c) "Any" shall be understood to include and encompass "all" and vice versa.
- d) Wherever appropriate herein, the masculine form of a word shall be interpreted as feminine and vice versa.
- e) "Including" shall mean "including without limitation."

5. If you are unable to answer or respond fully to any document request, answer or respond to the extent possible and specify the reasons for your inability to answer or respond in full. If the recipient has no documents responsive to a particular Request, the recipient shall so state.

6. Unless instructed otherwise, each Request shall be construed independently and not by reference to any other Request for the purpose of limitation.

7. The words “relate,” “relating,” “relates,” or any other derivative thereof, as used herein includes concerning, referring to, responding to, relating to, pertaining to, connected with, comprising, memorializing, evidencing, commenting on, regarding, discussing, showing, describing, reflecting, analyzing or constituting.

8. “Identify” means, with respect to any “person,” or any reference to the “identity” of any “person,” to provide the name, home address, telephone number, business name, business address, business telephone number and a description of each such person’s connection with the events in question.

9. “Identify” means, with respect to any “document,” or any reference to stating the “identification” of any “document,” provide the title and date of each such document, the name and address of the party or parties responsible for the preparation of each such document, the name and address of the party who requested or required the preparation and on whose behalf it was prepared, the name and address of the recipient or recipients to each such document and the present location of any and all copies of each such document, and the names and addresses of all persons who have custody or control of each such document or copies thereof.

10. In producing Documents, if the original of any Document cannot be located, a copy shall be produced in lieu thereof, and shall be legible and bound or stapled in the same manner as the original.

11. Any copy of a Document that is not identical shall be considered a separate document.

12. If any requested Document cannot be produced in full, produce the Document to the extent possible, specifying each reason for your inability to produce the remainder of the

Document stating whatever information, knowledge or belief which you have concerning the portion not produced.

13. If any Document requested was at any one time in existence but are no longer in existence, then so state, specifying for each Document (a) the type of document; (b) the types of information contained thereon; (c) the date upon which it ceased to exist; (d) the circumstances under which it ceased to exist; (e) the identity of all person having knowledge of the circumstances under which it ceased to exist; and (f) the identity of all persons having knowledge or who had knowledge of the contents thereof and each individual's address.

14. All Documents shall be produced in the same order as they are kept or maintained by you in the ordinary course of business.

15. You are requested to produce all drafts and notes, whether typed, handwritten or otherwise, made or prepared in connection with the requested Documents, whether or not used.

16. Documents attached to each other shall not be separated.

17. Documents shall be produced in such fashion as to identify the department, branch or office in whose possession they were located and, where applicable, the natural person in whose possession they were found, and business address of each Document's custodian(s).

18. If any Document responsive to the request is withheld, in all or part, based upon any claim of privilege or protection, whether based on statute or otherwise, state separately for each Document, in addition to any other information requested: (a) the specific request which calls for the production; (b) the nature of the privilege claimed; (c) its date; (d) the name and address of each author; (e) the name and address of each of the addresses and/or individual to whom the Document was distributed, if any; (f) the title (or position) of its author; (g) type of tangible object, *e.g.*, letter, memorandum, telegram, chart, report, recording, disk, etc.; (h) its title

and subject matter (without revealing the information as to which the privilege is claimed); (i) with sufficient specificity to permit the Court to make full determination as to whether the claim of privilege is valid, each and every fact or basis on which you claim such privilege; and (j) whether the document contained an attachment and to the extent you are claiming a privilege as to the attachment, a separate log entry addressing that privilege claim.

19. If any Document requested herein is withheld, in all or part, based on a claim that such Document constitutes attorney work product, provide all of the information described in Instruction No. 19 and also identify the litigation in connection with which the Document and the information it contains was obtained and/or prepared.

20. Plaintiff does not seek and does not require the production of multiple copies of identical Documents.

21. This Request is deemed to be continuing. If, after producing these Documents, you obtain or become aware of any further information, Documents, things, or information responsive to this Request, you are required to so state by supplementing your responses and producing such additional Documents to Plaintiff.

## INTERROGATORIES

1. Identify all persons and entities authorized by you or authorized your agent(s) to make statements on your behalf in January of 2015.

ANSWER:

2. Identify any action that you took after Ross Gow issued the January 2015 statement regarding Ms. [REDACTED] to the public to retract or remediate the statement, clarify the statement, or otherwise cause a different message to enter the public domain.

ANSWER:

3. Name every blog, television station, newspaper, or other media or public outlet that you are aware covered the January 2015 statement issued, either by quoting from the statement or by referring to or referencing the statement.

ANSWER:

4. Identify all legal actions you, or someone acting on your behalf, have initiated, since January 1, 2015, identifying the jurisdiction, the date of initiation of the action, and the subject matter of the action.

**ANSWER:**

5. Identify all payments made or things of value transferred to you by Jeffrey Epstein, directly or indirectly or through any entity or person affiliated with or controlled by Epstein, from 1992 through the present, and if loans, detailing the amount of the loans, the terms of the loans, the interest rate of the loans, and any payments made by you or on your behalf to repay such loans.

**ANSWER:**

6. Identify all loans issued to you by Jeffrey Epstein, directly or indirectly or through any entity or person affiliated with or controlled by Epstein, from 1992 through the present, detailing the amount of the loans, the terms of the loans, the interest rate of the loans, and any payments made by you or on your behalf to repay such loans.

**ANSWER:**

7. Identify any other employment you have held since 1999, how you were compensated, and how much you were compensated, broken down by job title, employer, and year.

8. Identify all persons who gave a message to Jeffrey Epstein with whom you had any involvement, either in meeting the person who gave a message, finding the person who gave the message, making a referral to the person who gave the message, conversing with the person who gave the message, staffing the person who gave the message, or otherwise facilitating that person giving a message to Jeffrey Epstein.

**ANSWER:**

9. Identify all efforts undertaken by you to ascertain the age of  from 2000-2002.

**ANSWER:**

10. Identify all efforts undertaken by you to ascertain the age and professional qualifications of any individual in your answer to Interrogatory number 9.

**ANSWER:**

11. Have you ever recruited, found, hired, approached, introduced, procured, or otherwise obtained, for the purposes of Jeffrey Epstein employing, any female who was not at the time a certified or licensed massage therapist for the purpose of having that female perform a massage on Jeffrey Epstein. If yes, please identify the name of each such female, the last known address and phone number, and a description of the circumstances surrounding that female meeting with your or Jeffrey Epstein.

**ANSWER:**

12. Have you ever recruited, found, hired, introduced, approached, or encouraged any female, and told that female to meet with, or show themselves to, Jeffrey Epstein because he was associated in some way with Victoria's Secret. For each such female, please list her name, address, telephone number, as well as a description of the circumstances surrounding that female's encounter with your or Jeffrey Epstein.

**ANSWER:**

13. Identify your basis for your contention that Plaintiff's claims are barred by the United Kingdom's Defamation Act of 2013.

**ANSWER:**

14. Identify the basis, including all underlying facts, for your contention that statements made by Ms. Maxwell or her agent were non-defamatory statements of fact or statements of opinion.

**ANSWER:**

15. Identify the basis, including all underlying facts, for your contention that Plaintiff's claims are barred because the statements made by Ms. Maxwell or her agent were protected by the self-defense privilege.

**ANSWER:**

16. Identify the basis, including all underlying facts, for your contention that Plaintiff is a public figure and unable to prove Ms. Maxwell exhibited actual malice.

**ANSWER:**

17. Identify the basis, including all underlying facts, for your contention that Plaintiff's claims are barred because the statements made by Ms. Maxwell or her agent were substantially true.

**ANSWER:**

18. Identify the basis, including all underlying facts, for your contention that Plaintiff's claims are barred because the statements made by Ms. Maxwell or her agent constituted "fair comment."

**ANSWER:**

19. Identify the basis, including all underlying facts, for your contention that Plaintiff's claims are barred because the statements made by Ms. Maxwell or her agent cannot realistically have caused impairment to Plaintiff's reputation.

**ANSWER:**

20. Identify the basis, including all underlying facts, for your contention that Ms. Maxwell or her agent did not cause or contribute to any damages suffered by Plaintiff?

**ANSWER:**

21. Identify the basis, including all underlying facts, for your contention that Plaintiff failed to take reasonable, necessary, appropriate and feasible steps to mitigate her alleged damages.

**ANSWER:**

22. Identify the basis, including all underlying facts, for your contention that Plaintiff's damages are the proximate result of intervening causes, pre-existing medical and mental conditions of Plaintiff, and/or causes that occurred without knowledge or participation of Ms. Maxwell and for which Ms. Maxwell is not responsible.

**ANSWER:**

23. Identify the basis, including all underlying facts, for your contention that Plaintiff's damages were the result of her own conduct or the conduct of others and were not proximately caused by any action of Ms. Maxwell.

**ANSWER:**

24. Identify the basis, including all underlying facts, for your contention that Ms. [REDACTED] voluntarily or negligently assumed a known risk.

**ANSWER:**

25. Identify all reasons why you failed to appear for a deposition scheduled in about 2009 to 2010 in a sexual assault civil suit filed against Jeffrey Epstein.

**ANSWER:**

26. Identify all communications you have had with Jeffrey Epstein since January 1, 2015, and the substance of those communications.

**ANSWER:**

27. Identify all flights you have taken on aircraft on which Ms. [REDACTED] was also a passenger.

**ANSWER:**

28. Identify all occasions on which you either observed Ms. [REDACTED] massaging Jeffrey Epstein or understood that she was massaging Jeffrey Epstein.

**ANSWER:**

29. Identify all occasions on which you have taken a photograph of a person in a naked or semi-naked state at one of Epstein's properties, including his Palm Beach mansion or his New York City mansion.

**ANSWER:**

30. Identify all persons or other sources of information who have told you or that suggested that Epstein had sexual interactions with persons under the age of 18.

**ANSWER:**

31. Identify all girls under the age of 18 with whom you have interacted at one of Epstein's properties, including his Palm Beach mansion or his New York City mansion.

**ANSWER:**

32. Identify any crimes, including but not limited to sex offenses, you committed in any jurisdiction between 1999 and 2002.

**ANSWER:**

Dated: May 26, 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  
[REDACTED]

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  
[REDACTED]

Paul G. Cassell (Pro Hac Vice)  
S.J. Quinney College of Law  
University of Utah  
383 University St.  
Salt Lake City, UT 84112  
[REDACTED]

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<sup>1</sup> 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**

WE HEREBY CERTIFY that a true and correct copy of the above and foregoing has been provided by electronic mail to all counsel of record identified below, on this 26th day of May, 2016.

Laura A. Menninger, Esq.  
Jeffrey S. Pagliuca, , Esq.  
HADDON, MORGAN & FOREMAN, P.C.  
150 East 10<sup>th</sup> Avenue  
Denver, Colorado 80203  
Tel: [REDACTED]  
Fax: [REDACTED]  
Email: [REDACTED]  
Email: [REDACTED]

By: /s/ Sigrid McCawley  
Sigrid McCawley