

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

██████████,

Plaintiff,

Case No.: ██████████

v.

Ghislaine Maxwell,

Defendant.

_____ /

**PLAINTIFF, ██████████ DISCLOSURE
PURSUANT TO FED. R. CIV. P. 26**

COMES NOW the Plaintiff, ██████████, by and through her undersigned counsel,
and files this disclosure pursuant to Fed. R. Civ. P. 26 and states as follows:

A. Witnesses:

1. ██████████
c/o Sigrid S. McCawley, Esq.
Boies, Schiller & Flexner LLP
401 East Las Olas Boulevard, Suite 1200
Miami, Florida 33301
Tel: ██████████
Email: ██████████

Plaintiff - information regarding Defendant, Ghislaine Maxwell's conduct that is
the subject of this action

2. Ghislaine Maxwell
c/o Laura A. Menninger, Esq.
HADDON, MORGAN & FOREMAN, P.C.
150 East 10th Avenue
Denver, Colorado 80203
Tel: ██████████
Email: ██████████

Defendant in this action.

3. Juan Alessi
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action
4. Maria Alessi
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
5. Janusz Banasiak
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
6. Doug Band
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
7. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge concerning Defendant's conduct that is the subject of this action.
8. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
9. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.

10. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
11. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge concerning Defendant's conduct that is the subject of this action.
12. Jean Luc Brunel
Address unknown at this time
Telephone number unknown at this time

Knowledge concerning Defendant's conduct that is the subject of this action.
13. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
14. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
15. Valdson Cotrin
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
16. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge concerning Defendant's conduct that is the subject of this action.

17. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
18. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
19. Alan Dershowitz
c/o Richard A. Simpson, Esq.
WILEY REIN, LLP
1776 K Street NW
Washington, D.C. 20006
Tel: [REDACTED]

Knowledge of Defendant's conduct that is the subject of this action.
20. Ryan Dionne
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
21. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
22. Eva Anderson Dubin
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
23. Glen Dubin
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.

24. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
25. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
26. Prince Andrew Albert Christian Edward, Duke of York
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
27. Jeffrey Epstein
c/o Tonja Haddad Coleman, Esq.
315 SE 7th Street, Suite 301
Fort Lauderdale, FL 33301
Tel: [REDACTED]

Knowledge of Defendant's conduct that is the subject of this action.
28. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
29. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
30. Alexandra Fekkai
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.

31. Frederic Fekkai
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
32. Tony Figueroa
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
33. Luciano "Jojo" Fontanilla
Address unknown at this time
[REDACTED]

Jeffrey Epstein's staff member in his various homes with knowledge of Defendant and Jeffrey Epstein's inappropriate conduct with underage girls.
34. Lynn Fontanilla
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
35. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
36. Michael Friedman
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
37. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.

38. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
39. Fred Graff
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
40. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
41. [REDACTED] [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
42. [REDACTED] [REDACTED]
Address unknown at this time
Telephone number unknown at this time
Knowledge of Defendant's conduct that is the subject of this action.
43. Shelly Harrison
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
44. Shannon Harrison
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
45. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.

46. [REDACTED] s formerly [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
47. [REDACTED] [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
48. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
49. Adam Perry Lang
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
50. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
51. Michael Liffmann
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
52. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
53. [REDACTED] [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.

54. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
55. [REDACTED] [REDACTED] formerly [REDACTED] [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
56. Bob Meister
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
57. Todd Meister
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
58. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
59. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
60. Marvin Minsky
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.

61. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
62. Vanessa Modely
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
63. David Mullen
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
64. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
65. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
66. Joe Pagano
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
67. Mary Paluga
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.

68. Joel Pashcow
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
69. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action
70. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
71. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
72. Tom Pritzker
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
73. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
74. Rinaldo Rizzo
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.

75. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
76. David Rogers
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
77. [REDACTED] formerly [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
78. Forest Sawyer
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
79. Doug Schoettle
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
80. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
81. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.

82. Ellen Spencer
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
83. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
84. Mark Tafoya
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
85. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
86. Brent Tindall
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
87. Ed Tuttle
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
88. Emma Vaghan
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.

89. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
90. Evelyn Valenzuela
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
91. [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
92. Larry Visosky
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
93. [REDACTED] [REDACTED]
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
94. Igor Zinoviev
Address unknown at this time
Telephone number unknown at this time

Knowledge of Defendant's conduct that is the subject of this action.
95. All other then-minor girls, whose identities Plaintiff will attempt to determine, with whom Defendant, Ghislaine Maxwell and Jeffrey Epstein, have engaged in sexual activity.
96. All pilots, chauffeurs, chefs, and other employees of either Defendant Maxwell or Jeffrey Epstein with knowledge of Defendant and Jeffrey Epstein's inappropriate conduct with underage girls.
97. All staff and employees at the Mar-a-Lago Club during 1999.

98. All other witnesses learned through discovery process.

B. Exhibits:

1. Palm Beach Police Department report and documents contained within Jeffrey Epstein's criminal files, attached hereto as Exhibit A.
2. March 10, 2011 Statement on behalf of Ghislaine Maxwell by Media agent Ross Gow, attached hereto as Exhibit B.
3. January 3, 2015 Daily Mail article: "Harvard Law Professor Named Alongside Prince Andrew in 'Sex Slave' Case Accuses Alleged Victim of 'Making Up Stories,'" attached hereto as Exhibit C.
4. January 3, 2015 Press Statement issued by Ross Gow to Express set forth in "Ghislaine Maxwell: I was not a madam for paedophile," attached as Exhibit D.
5. January 4, 2015 Statement by Ghislaine Maxwell to New York Daily News Reporter "Alleged Madam Accused of Supplying Prince Andrew With Underage Teen for Sex Spotted in NYC – As He's Seen Cutting Swiss Vacation Short to Face Queen," attached hereto as Exhibit E.
6. February 1, 2015 Mirror article: "Prince Andrew's Pal Ghislaine Maxwell May Sue Over Madam Allegations," attached hereto as Exhibit F.
7. May 1, 2009 Complaint in Jane Doe No. 102 v. Jeffrey Epstein, CIV-09-80656, in the Southern District of Florida, attached hereto as Exhibit G.
8. Flight Logs, attached hereto as Exhibit H.

C. Computation of damages:

1. Physical, psychological and psychiatric injuries and resulting medical expenses – precise amount yet to be computed, but not less than \$100,000.00.
2. Past, present and future pain and suffering, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of standing in the community, loss of dignity and invasion of privacy in her public and private life – precise amount yet to be computed, but not less than \$30,000,000.00.
3. Past and future lost wages and past and future loss of earning capacity and actual earnings – precise amounts yet to be computed, but not less than \$5,000,000.00.
4. Punitive Damages - to be based upon all relevant factors, including the egregious nature of Defendant, Ghislaine Maxwell's conduct and the need for a large award

to punish and deter conduct in view of the vast wealth of Defendant Maxwell, in an amount not less than \$50,000,000.00

WE HEREBY CERTIFY that a true and correct copy of the above and foregoing Disclosure Pursuant to Fed. R. Civ. P. 26 has been provided by United States mail and electronic mail to all counsel of record identified below, on this 11th day of November, 2015.

Laura A. Menninger, Esq.
HADDON, MORGAN & FOREMAN, P.C.
150 East 10th Avenue
Denver, Colorado 80203
Tel: [REDACTED]
Fax: [REDACTED]
Email: [REDACTED]

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley

Sigrid McCawley (Pro Hac Vice)
Boies Schiller & Flexner LLP
401 E. Las Olas Blvd., Suite 1200
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David Boies
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