

United States District Court
Southern District Of New York

-----X
[REDACTED],
Plaintiff,
v. [REDACTED]
Ghislaine Maxwell,
Defendant.
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**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
[REDACTED]
[REDACTED]

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. [REDACTED]
c/o Sigrid S. McCawley, Esq.
Boies, Schiller & Flexner LLP
401 East Las Olas Boulevard, Suite 1200

Miami, Florida 33301
[REDACTED]
[REDACTED]

[REDACTED] is the Plaintiff and has knowledge concerning the matters at issue in her Complaint, including the events of 1996-2015 and the publication of statements in the press in 2011-2015.

3. Philip Barden
Devonshires Solicitors LLP
30 Finsbury Circus
London, United Kingdom
EC2M 7DT
DX: 33856 Finsbury Square
[REDACTED]

Mr. Barden has knowledge concerning press statements by Plaintiff and Defendant in 2011-2015 at issue in this matter.

4. Paul Cassell
College of Law, University of Utah
383 South University Street
Salt Lake City, UT 84112
[REDACTED]

Mr. Cassell has knowledge concerning press statements by Plaintiff, Plaintiff's court pleadings, and Plaintiff's sworn testimony.

5. Alan Dershowitz
c/o Richard A. Simpson, Esq.
WILEY REIN, LLP
1776 K Street NW
Washington, D.C. 20006
[REDACTED]

Mr. Dershowitz has knowledge concerning Plaintiff's false statements to the press, in court pleadings, and in sworn testimony, at issue in this matter.

6. Bradley Edwards
Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.
425 N. Andrews Ave., Suite 2
Ft. Lauderdale, FL 33301
[REDACTED]

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
[REDACTED]

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

[REDACTED] may have knowledge concerning matters at issue, including Plaintiff's activities during 1996 – 2002.

9. Louis Freeh
Address unknown at this time

[REDACTED]
[REDACTED]

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

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

[REDACTED] 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
44 (0) [REDACTED]
[REDACTED]

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

12. Philip Guderyon

Address unknown at this time

Telephone number unknown at this time

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

13. Carol Roberts Kess

Address unknown at this time

Telephone number unknown at this time

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

14. Lynn Miller

Address unknown at this time

Telephone number unknown at this time

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

15.

Address unknown at this time

Telephone number unknown at this time

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

16.

Address unknown at this time

Telephone number unknown at this time

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

17.

Address unknown at this time

Telephone number unknown at this time

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

18. Andrew Albert Christian Edwards, Duke of York

Address unknown at this time

Telephone number unknown at this time

The Duke has knowledge concerning Plaintiff's false statements to the press, in court pleadings, and in sworn testimony as well as the events of 1999-2002.

19. Any other witness learned through the discovery process.

Defendant Ghislaine Maxwell reserves her right to supplement these disclosures as additional witnesses are learned through the discovery process.

II. DOCUMENTS, DATA, COMPILATIONS AND TANGIBLE THINGS IN POSSESSION, CUSTODY OR CONTROL OF DEFENDANT THAT MAY BE USED TO SUPPORT DEFENDANT'S CLAIM OR DEFENSES ¹

1. News articles from the internet:

- a. "Sordid friends and why he isn't fit for the job: Duke of York risks losing ambassador role," Daily Mail Online (Feb. 28, 2011).
- b. "Prince Andrew and the 17-year-old girl his sex offender friend flew to Britain to meet him," Daily Mail Online (corrected Mar. 2, 2011).
- c. "Unsavory association: How Robert Maxwell's daughter 'procured young girls' for Prince Andrew's billionaire friend," Daily Mail Online (Mar. 5, 2011).
- d. 
- e. "Court papers put daughter of Robert Maxwell at centre of 'sex slave' scandal," The Guardian (Jan. 4, 2015).
- f. "Prince Andrew denies sexual abuse allegations in unprecedented Buckingham Palace statement: The Duke of York denies having relations with alleged 'sex slave,'" The Independent (Jan. 4, 2015).
- g. "Prince Andrew story runs and runs - but editors should beware," The Guardian (Jan. 5, 2015).
- h. "US lawyer sues in Prince Andrew sex claims case," Time (Jan 6, 2015).

¹ All non-privileged listed documents are located at defense counsel's offices. Copies will be provided upon request.

- i. “Harvard professor Alan Dershowitz denies charges of sex with underage girl,” Boston Globe (Jan. 22, 2015).
2. Email from Ross Gow to various news organizations, Subject: “Ghislaine Maxwell,” (Jan. 2, 2015).
3. Email correspondence between Philip Barden and Ghislaine Maxwell concerning the issuance of statements to the press (March 2011 – January 2015) (Attorney-Client privileged communications).
4. Documents received from any other party through disclosures and/or in discovery, including any deposition exhibits, will not be identified or produced, though they technically may fall within this category “II”, and Defendant reserves the right to utilize such documents at any hearing or trial on this matter.

Defendant reserves the right to identify additional documents, data, compilations and tangible things as discovery continues and to supplement this list accordingly.

III. DESCRIPTION OF CATEGORIES OF DAMAGES SOUGHT AND COMPUTATION OF ECONOMIC DAMAGES CLAIMED BY THE DISCLOSING PARTY

Not applicable at this time. Ms. Maxwell reserves her right to supplement these disclosures following the filing of any counterclaims she may have in this case.

IV. INSURANCE AGREEMENT UNDER WHICH ANY PERSON CARRYING ON AN INSURANCE BUSINESS MAY BE LIABLE TO SATISFY A PART OR ALL OF A JUDGMENT

None.

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: [REDACTED]
Fax: [REDACTED]

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
[REDACTED]

s/ Laura A. Menninger

Laura A. Menninger