

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

██████████,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

_____ /

**PLAINTIFF'S REQUEST FOR ADMISSIONS
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 36 of the Federal Rules of Civil Procedure and Local Rule _____. 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, telecopies, 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, telecopies, 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. If you deny only a portion of a request to admit, specify in full and complete detail: (a) the portion of the request that is denied; (b) the reasons for your denial; and (c) those positions that are admitted as true.
2. When an objection is made to a request to admit, specify in full the grounds for your objection.

REQUESTS FOR ADMISSION

1. Admit that Ross Gow was authorized by You or your agents to make statements to the public on your behalf.
2. Admit that Acuity Reputation was authorized by You or your agents to make statements to the public on your behalf.
3. Admit that Ross Gow had your approval to make the statement that he made to the public in January of 2015.
4. Admit that Ross Gow had your approval or your agent's approval to make the statement that he made to the public in January of 2015.
5. Admit that you knew or had reason to believe that Ross Gow would make a press release addressing accusations made against you in January 2015.
6. Admit that you knew or had reason to believe that one of your agents would cause a press release to issue regarding [REDACTED].
7. Admit that you knew or had reason to believe that Ross Gow's press release would be reported by the press.
8. Admit that after Ross Gow issued the January 2015 statement to the public, you took no action to retract or remediate the statement, clarify the statement, or otherwise cause a different message to enter the public domain.
9. Admit that you, Ross Gow, and Acuity Reputation did not have [REDACTED] consent to make any statements regarding [REDACTED].
10. Admit that having your statements be classified as "obvious lies" in the news media is damaging to one's reputation.

11. Admit that you asked [REDACTED] (then, [REDACTED]) to meet Jeffrey Epstein.
12. Admit that you asked [REDACTED] (then, [REDACTED]) to work for Jeffrey Epstein.
13. Admit that Jeffrey Epstein had sex with individuals who gave him massages.
14. Admit that you were aware that [REDACTED] was under the age of 18 when you facilitated her giving massages to Jeffrey Epstein.
15. Admit that you met [REDACTED] [REDACTED] at Mar-A-Lago.
16. Admit that you introduced [REDACTED] to Jeffrey Epstein.
17. Admit that you travelled on Jeffrey Epstein's private plane with [REDACTED] during the year 2001.
18. Admit that [REDACTED] was present at your London home in 2001 with Prince Andrew.

Dated: May 26, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley

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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

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.

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By: /s/ Sigrid McCawley
Sigrid McCawley