

# **EXHIBIT A**

United States District Court  
Southern District Of New York

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Virginia L. Giuffre,  
  
Plaintiff,

v.

Ghislaine Maxwell,  
  
Defendant.

15-cv-07433-RWS

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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. 10<sup>th</sup> Ave.  
Denver, CO 80203  
303-831-7364  
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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

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Ms. Giuffre 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  
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[Philip.Barden@devonshires.co.uk](mailto:Philip.Barden@devonshires.co.uk)

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  
801-585-5202  
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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  
(202) 719-7000

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.  
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Dated: February 24, 2016.

Respectfully submitted,

*s/ Laura A. Menninger*

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*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:

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*s/ Laura A. Menninger*

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Laura A. Menninger