

COMPOSITE
EXHIBIT 1
(File Under Seal)



Haddon, Morgan and Foreman, P.C.
Laura A. Menninger

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August 16, 2016

VIA EMAIL

Sigrid S. McCawley
Boies, Schiller & Flexner LLP
401 East Las Olas Blvd., Suite 1200
Fort Lauderdale, FL 33301
smccawley@bsflp.com

Re: *Giuffre v. Maxwell*, Case No. 15-cv-07433-RWS

Dear Sigrid:

Attached please find documents produced pursuant to a subpoena *duces tecum* issued to Mar-a-Lago Club, Inc., on July 14, 2016 which have been Bates numbered Mar-A-Lago 0075-0595.

Also attached are two documents Bates numbered GM_01141-01144. These emails were collected as responsive to Plaintiff's First Request for Production of Documents in February 2016 but through clerical error were not produced at that time or following the Court's *in camera* review in April. A recent review of documents revealed the error.

Sincerely,

HADDON, MORGAN AND FOREMAN, P.C.

/s/ Laura A. Menninger
Laura A. Menninger

From: Ross Gow [REDACTED]
Sent: 10 November 2015 18:16
To: Gmax; Philip Barden
Subject: Fwd: Inquiry from The New York Times

Hi Ghislaine and Philip
Please advise how you wish to respond...
Best
Ross

----- Forwarded message -----

From: Meier, Barry [REDACTED]
Date: Tuesday, 10 November 2015
Subject: Inquiry from The New York Times
To: [REDACTED]

Mr. Gow,
Good day. I am a reporter for the Times and it is my understanding that you represent Ghislaine Maxwell.
I am working on an article about the legal fallout from the Jeffrey Epstein case.
I anticipate mentioning the lawsuit filed earlier this year by Virginia Roberts Guiffie against Ms. Maxwell.
How does she respond?
Kindly advise by close of business Thursday, November 12, 2015.
And call me if you have any questions.
Regards,
Barry Meier

--
The New York Times
620 Eighth Avenue
New York, NY 10018
[REDACTED]

--

Ross Gow
Managing Partner
ACUITY Reputation
23 Berkeley Square
London W1J 6HE

[REDACTED]

[REDACTED]

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The Devonshires Foundation is proud to support Action for Kids (reg. charity 1068841), Wide horizons (reg. charity 1105847), and Theatre Royal Stratford East (reg. charity 233801) during 2014/2015.

Please consider the environment before printing this email.

From: jeffrey E. <jeevacation@gmail.com>
Sent: Wednesday, April 22, 2015 3:58 PM
To: 'Ghislaine'
Subject: Re: ATTORNEY-CLIENT PRIVILEGE

ok

On Wed, Apr 22, 2015 at 5:46 PM, Ghislaine <Ghislaine@theterramarproject.org> wrote:
I would like Barden to reply to one further allegation in this bullshit

She says Epstein and Maxwell asked her
> to have a child for them and to sign a document signing away
> the rights to the child in the event that she and Epstein
> had a falling out. She says she refused this
> request.

Regarding further detail of the interview which I have reviewed I would like to add one further point to underscore the lack of probity in Ms Roberts claims

At no point in Ms Maxwell's life has she ever contemplated thought or wanted to bring up someone's child as her own and or ask the mother to sign her rights away to the child. In fact the mere idea of such a suggestion is abhorrent. Further, the idea that Ms Maxwell would contemplate an arrangement with someone who abused drugs and alcohol contemporaneously and who was living with her fiancé beggars belief. No document has ever been contemplated, created nor lawyer nor other approached to write such a document at anytime

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From: J Jep
Date: Wednesday, April 22, 2015 at 15:08 PM
To: Gmax
Subject: Fwd: ATTORNEY-CLIENT PRIVILEGE

She says Epstein and Maxwell asked her
> to have a child for them and to sign a document signing away
> the rights to the child in the event that she and Epstein
> had a falling out. She says she refused this
> request.

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please note

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