

United States District Court For The Southern District of New York

Giuffre v. Maxwell 15-cv-07433-RWS Ghislaine Maxwell's Privilege Log Amended as of August 1, 2016

***Per Local Rule 26.2, the following privileges are asserted pursuant to British law, Colorado law and NY law.

Log ID	DATE	DOC. TYPE	BATES #	FROM	ТО	CC	RELATIONSHIP OF PARTIES	SUBJECT MATTER	PRIVILEGE
1.	2011.03.15	E-Mails	1000-	Ghislaine Maxwell	Brett Jaffe, Esq.		Attorney / Client	Communication	Attorney-Client
			1013					re: legal advice	
2.	2011.03.15	E-Mails	1014- 1019	Brett Jaffe, Esq.	Ghislaine Maxwell		Attorney / Client	Communication re: legal advice	Attorney-Client
3.	2015.01.02	E-Mails	1020-	Ross Gow	Ghislaine Maxwell		Attorney Agent /	Communication	Attorney-Client
			1026				Client	re: legal advice	
4.	2015.01.02	E-Mail	1024-	Ghislaine Maxwell	Ross Gow		Attorney Agent /	Communication	Attorney-Client
			1026				Client	re: legal advice	
5.	2015.01.02	E-Mail	1027-	Ross Gow	Ghislaine Maxwell	Brian	Attorney Agent /	Communication	Attorney-Client
			1028			Basham	Client	re: legal advice	
6.	2015.01.06	E-Mail	1029	Ghislaine Maxwell	Jeffrey Epstein		Common Interest	Communication	Common Interest
								re: legal advice	
7.	2015.01.06	E-Mail	1030-	Ghislaine Maxwell	Jeffrey Epstein,		Attorney / Client	Communication	Common Interest
			1043		Alan Dershowitz, Esq.			re: legal advice	
8.	2015.01.10	E-Mail	1044	Ghislaine Maxwell	Philip Barden, Esq.,		Attorney / Client	Communication	Attorney-Client
					Ross Gow			re: legal advice	
9.	2015.01.10	E-Mail	1045-	Ghislaine Maxwell	Philip Barden, Esq.		Client / Attorney	Communication	Attorney-Client
			1051					re: legal advice	
10.	2015.01.09 -	E-Mails	1052-	Ross Gow	Philip Barden, Esq.	G.	Agent / Attorney /	Communication	Attorney-Client
	2015.01.10		1055			Maxwell	Client	re: legal advice	
11.	2015.01.11	E-Mail	1055-	Ghislaine Maxwell	Jeffrey Epstein		Common Interest	Communication	Common Interest
			1058					re: legal advice	
12.	2015.01.11	E-Mail	1055-	Philip Barden, Esq.	Ross Gow	G.	Attorney / Agent /	Communication	Attorney-Client
			1058			Maxwell	Client	re: legal advice	_
13.	2015.01.11	E-Mail	1056-	Philip Barden, Esq.	Ghislaine Maxwell	Ross	Attorney / Agent /	Communication	Attorney-Client
			1058			Gow	Client	re: legal advice	-

14.	2015.01.11 - 2015.01.17	E-Mails	1059- 1083	Jeffrey Epstein	Ghislaine Maxwell		Common Interest	Communication re: legal advice	Common Interest Privilege
15.	2015.01.13	E-Mail	1067- 1073	Ghislaine Maxwell	Jeffrey Epstein		Common Interest	Communication re: legal advice	Common Interest Privilege
16.	2015.01.13	E-Mail	1069- 1073,	Philip Barden, Esq.	Martin Weinberg, Esq.		Common Interest	Communication re: legal advice	Common Interest Privilege
			1076- 1079						
17.	2015.01.13	E-Mails	1068- 1069,	Philip Barden, Esq.	Ghislaine Maxwell	Mark Cohen	Attorney / Client	Communication re: legal advice	Attorney-Client
			1074- 1076						
18.	2015.01.21	E-Mail	1088- 1090	Ross Gow	Philip Barden, Esq., Ghislaine Maxwell		Agent / Attorney / Client	Communication re: legal advice	Attorney-Client
19.	2015.01.21 - 2015.01.27	E-Mails	1084- 1098	Jeffrey Epstein	Ghislaine Maxwell		Common Interest	Communication re: legal advice	Common Interest Privilege
20.	2015.01.21- 2015.01.27	E-Mails	1099	Ghislaine Maxwell	Jeffrey Epstein		Common Interest	Communication re: legal advice	Common Interest Privilege
21.	2015.04.22	E-mail	7 pages	Jeffrey Epstein	Ghislaine Maxwell		Common Interest	Forwarding message from Martin Weinberg, labeled "Attorney- Client Privilege" with attachment	Common Interest Privilege
22.	Various	E-mails		Agent of Haddon, Morgan & Foreman; Laura Menninger	Agent of Haddon, Morgan & Foreman; Laura Menninger		Agent of attorney and Attorney	Attorney work product	Attorney Work Product
23.	Various	E-mails		Mary Borja; Laura Menninger	Mary Borja; Laura Menninger		Attorney Work Product	Attorney work product	Attorney Work Product
24.	2015.10.21 - 2015.10.22	E-mail chain with attachment		Darren Indyke; Laura Menninger	Darren Indyke; Laura Menninger		Attorneys for parties to Common Interest Agreement	Common Interest Agreement	Attorney Work Product; Common Interest Privilege
25.	2015.01.06						Attorney/Client	Document prepared by Ghislaine Maxwell at the direction of Philip Barden	Attorney Work Product; Attorney-Client Communication

26.	2015.01.23			Attorney/Client	Document	Attorney Work Product;
					prepared by	Attorney-Client
					Ghislaine	Communication
					Maxwell at the	
					direction of Philip	
					Barden	