

## **EXHIBIT D**

Confidential

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - x  
VIRGINIA L. GIUFFRE,

Plaintiff,

-against-

Case No.:  
15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendant.

- - - - - x

\*\*CONFIDENTIAL\*\*

Continued Videotaped Deposition of GHISLAINE MAXWELL, the Defendant herein, taken pursuant to subpoena, was held at the law offices of Boies, Schiller & Flexner, LLP, 575 Lexington Avenue, New York, New York, commencing July 22, 2016, 9:04 a.m., on the above date, before Leslie Fagin, a Court Reporter and Notary Public in the State of New York.

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 30 BY: JEFFREY S. PAGLIUCA, ESQUIRE  
 31 LAURA A. MENNIGER, ESQUIRE  
 32 Also Present:  
 33

1  
 2 MR. EDWARDS: Brad Edwards, also  
 3 representing the plaintiff, Virginia  
 4 Giuffre.  
 5 MR. POTTINGER: Stan Pottinger,  
 6 also representing the plaintiff.  
 7 MR. CASSELL: Paul Cassell, from  
 8 Salt Lake City, Utah, also representing  
 9 Ms. Giuffre.  
 10 MR. PAGLIUCA: Jeff Pagliuca and  
 11 Laura Menninger, on behalf of Ms.  
 12 Maxwell.  
 13 And Ms. McCawley has also entered  
 14 the room, and we have an assistant from  
 15 Boies Schiller from the Fort Lauderdale  
 16 office here today as well today.  
 17 THE VIDEOGRAPHER: Will the court  
 18 reporter please swear in the witness.  
 19 G H I S L A I N E M A X W E L L ,  
 20 called as a witness, having been duly  
 21 sworn by a Notary Public, was  
 22 examined and testified as follows:  
 23 EXAMINATION BY  
 24 MR. BOIES:  
 25 Q. Good morning, Ms. Maxwell. [REDACTED]

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1  
 2 THE VIDEOGRAPHER: This is DVD No.  
 3 1, Volume II, of the continued video  
 4 recorded deposition of Ghislaine Maxwell  
 5 in the matter Virginia Giuffre against  
 6 Ghislaine Maxwell, in the United States  
 7 District Court, Southern District of New  
 8 York.

9 This deposition is being held at  
 10 575 Lexington Avenue, New York, New  
 11 York, on July 22, 2016 at approximately  
 12 9:04 a.m.

13 My name is Rodolfo Duran. I am the  
 14 legal video specialist. The court  
 15 reporter is Leslie Fagin, and we are  
 16 both in association with Magna Legal  
 17 Services.

18 Will counsel please introduce  
 19 themselves.

20 MR. BOIES: This is David Boies, of  
 21 Boies, Schiller & Flexner, counsel for  
 22 plaintiff.

23 MS. SCHULTZ: Meredith Schultz,  
 24 from Boies Schiller & Flexner, counsel  
 25 for plaintiff.

1 G. Maxwell - Confidential  
 2 [REDACTED]

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1 G. Maxwell - Confidential  
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1 G. Maxwell - Confidential  
2

22 MR. PAGLIUCA: Object to the form  
23 and foundation.  
24 MR. BOIES: Excuse me, counsel.  
25 MR. PAGLIUCA: I'm objecting to

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1 G. Maxwell - Confidential  
2  
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1 G. Maxwell - Confidential  
2 form and foundation, and I have an  
3 opportunity to do that.  
4 MR. BOIES: Yes, you do, but you do  
5 not have an opportunity to disrupt the  
6 deposition.  
7 MR. PAGLIUCA: Which I'm not.  
8 MR. BOIES: The court will decide  
9 that, as the court has decided the  
10 issues before.  
11

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Page 12

1 G. Maxwell - Confidential  
2 [REDACTED]

Page 11

Page 13

1 G. Maxwell - Confidential  
2 [REDACTED]

1 G. Maxwell - Confidential  
2 [REDACTED]  
3 [REDACTED]

6 Q. You understand that you are under  
7 oath, correct?  
8 A. I do.

9 Q. And you understand that the oath  
10 requires you to tell the truth, the whole  
11 truth and nothing but the truth in response  
12 to questions?

13 MR. PAGLIUCA: Object to the form  
14 and foundation.

15 Q. Do you?  
16 A. I do understand that.  
17 Q. Do you understand if you fail to do  
18 that, that you could be prosecuted for  
19 perjury?

20 MR. PAGLIUCA: Object to the form  
21 and foundation.

22 A. I understood that is what happens  
23 at these events.

24 Q. And do you understand that if you  
25 say that you do not recall and in fact you do

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<p>1 G. Maxwell - Confidential 2 recall, that would violate your oath? 3 MR. PAGLIUCA: Object to the form 4 and foundation. 5 A. If I don't recall, I don't recall. 6 It's not a question of whether I'm violating 7 my oath or not. I don't know.</p> <p>[REDACTED]</p>	<p>1 G. Maxwell - Confidential 2 [REDACTED] 23 Q. Were you ever on a plane with 24 Mr. Epstein when Mr. Epstein had sex with 25 anyone?</p>
<p>1 G. Maxwell - Confidential 2 [REDACTED]</p> <p>[REDACTED]</p>	<p>1 G. Maxwell - Confidential 2 MR. PAGLIUCA: Object to the form 3 and foundation. 4 A. How would I know? 5 Q. Were you ever on a plane with 6 Mr. Epstein when, to your knowledge, 7 Mr. Epstein had sex with anyone? 8 A. Can you repeat the question? 9 Q. Were you ever on a plane with 10 Mr. Epstein when, to your knowledge, 11 Mr. Epstein had sex with anyone? 12 A. Not that I can recall. 13 Q. Were you ever on a plane with 14 Mr. Epstein when you saw Mr. Epstein having 15 sex with anyone? 16 A. Never. 17 Q. I want to be sure that the question 18 and answer is meeting. When you refer to 19 having sex with someone, what are you 20 referring to? 21 MR. PAGLIUCA: Object to the form 22 and foundation. 23 A. Intercourse. 24 Q. And when you refer to intercourse, 25 what do you refer to?</p>

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Page 20

1 G. Maxwell - Confidential  
2 A. I think everyone here can  
3 understand what intercourse is, is when you  
4 have sex. I don't know how to say  
5 intercourse any other way, having sex with  
6 somebody. Perhaps you would like to define  
7 it for me.

8 Q. I'm trying to get your definition  
9 right now because you are the witness. When  
10 you use the term intercourse, what are you  
11 referring to?

12 A. I'm referring to a penis entering  
13 someone's vagina.  
14 [REDACTED]

1 G. Maxwell - Confidential  
2 [REDACTED]

11 MR. PAGLIUCA: I'm going to  
12 instruct you not to answer, unless you  
13 tie it to a specific individual related  
14 to this case per the court's order.

15 MR. BOIES: I think the court's  
16 order specifically permits this question  
17 with respect to occasions related to  
18 this case. If you instruct her not to  
19 answer, all you're going to do is bring  
20 her back. That's up to you.

21 MR. PAGLIUCA: It's up to you as  
22 the questioner, Mr. Boies.  
[REDACTED]

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Page 21

1 G. Maxwell - Confidential  
2 [REDACTED]

1 G. Maxwell - Confidential  
2 [REDACTED]

6 You haven't tied your question to  
7 time or individual or specific location.  
8 And so unless you do that, we have an  
9 open-ended question that would span from  
10 the early '90s to 2000 or so, which  
11 would not be tied to the key events,  
12 individuals or locations of this case.

13 BY MR. BOIES:

14 Q. Let me ask you a couple more  
15 questions. Then I think we probably ought to  
16 call the court and get some guidance on this.  
17 [REDACTED]

24 Q. Were you ever on Mr. Epstein's  
25 plane when, to your knowledge, Mr. Epstein  
[REDACTED]

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<p>1 G. Maxwell - Confidential 2 had oral sex with anyone [REDACTED] 3 A. No. 4 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]</p>	<p>Page 22</p> <p>1 G. Maxwell - Confidential 2 court case on this list, one other person. 3 Q. Which one is that? 4 A. [REDACTED], because she has been 5 on the court papers. 6 Q. [REDACTED] who? 7 A. [REDACTED] 8 The only two I know is [REDACTED] and 9 Virginia, and one other name I recognize. 10 Q. So just to be clear, the only two 11 people listed on Maxwell Deposition Exhibit 12 26 that you know are [REDACTED] 13 A. And Virginia Roberts, yes. 14 Q. And the only other person on -- 15 A. I don't know her, I recognize her 16 name. 17 Q. -- whose name you recognize is 18 [REDACTED], but you don't know her, never 19 met her? 20 A. I don't recall ever meeting her. 21 Q. Other than what you know from her 22 participation in this case, you don't know 23 anything about her, is that your testimony? 24 A. I don't even know -- I don't even 25 recognize what her participation is in this</p>
<p>1 G. Maxwell - Confidential 2 [REDACTED] 3 [REDACTED]. 4 MR. BOIES: I will show you a 5 document we have marked for 6 identification as Maxwell Deposition 7 Exhibit 26. 8 (Maxwell Exhibit 26, List of names, 9 marked for identification, as of this 10 date.) 11 Q. I would like you to go down this 12 list and tell me which names, if any, you 13 recognize on this list. 14 A. Just in the way the list runs in 15 order, I recognize the names -- by recognize, 16 only stating that I know the name, I'm not 17 making any representations about these 18 people. 19 Q. I understand that, and I will come 20 back and ask you, but if you don't recognize 21 the name... 22 A. [REDACTED]. Virginia Roberts. 23 And that's it on this list. Let me just 24 double-check. I recognize the name, not 25 because I know her, but just because of the</p>	<p>Page 23</p> <p>1 G. Maxwell - Confidential case. I just know I recognize her name, and 3 I can't recall right now what her involvement 4 is, but I recognize the name. 5 Q. Other than whatever her involvement 6 in this case may be or may not be? 7 A. Correct. 8 Q. Is it fair to say it is your 9 testimony that except for that, you have no 10 knowledge about her at all? 11 A. Correct. 12 Q. And other than [REDACTED], 13 Virginia Roberts and [REDACTED], you don't 14 know anything at all about any of the other 15 people listed here, is that your testimony? 16 A. I don't even know who they are. 17 You could put any names in front of me, I 18 wouldn't recognize them, I don't know them, I 19 don't even recognize the names. 20 Q. I think this is clear from your 21 last answer, but I want to be sure. It is 22 your testimony that other than [REDACTED] 23 and Virginia Roberts, you never met any of 24 these people at any homes of Mr. Epstein, is 25 that your testimony?</p>

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<p>1 G. Maxwell - Confidential</p> <p>2 MR. PAGLIUCA: Object to the form</p> <p>3 and foundation.</p> <p>4 A. I don't even know who they are, so</p> <p>5 I wouldn't -- I have no clue who they are, I</p> <p>6 don't know where they are, I don't know where</p> <p>7 they come from, I don't recognize -- I only</p> <p>8 pointed out [REDACTED] because I recognize</p> <p>9 the name from various documents I read. I</p> <p>10 don't have any knowledge of any other person</p> <p>11 on this list. I don't believe I've ever even</p> <p>12 seen these names. I don't know who they are</p> <p>13 at all.</p> <p>14 I would not be able to identify a</p> <p>15 single name on this list other than those</p> <p>16 three that I have indicated to you.</p> <p>17 [REDACTED]</p>	<p>1 G. Maxwell - Confidential</p> <p>2 a massage at his home in New York, regardless</p> <p>3 of where in the home it was?</p> <p>4 A. No.</p> <p>5 Q. Have you ever seen anyone give</p> <p>6 Mr. Epstein a massage at his home in Palm</p> <p>7 Beach?</p> <p>8 A. I have.</p> <p>9 Q. Have you ever seen anyone give</p> <p>10 Mr. Epstein a massage in New Mexico?</p> <p>11 A. No, I can't recall.</p> <p>12 Q. Have you ever seen anyone give</p> <p>13 Mr. Epstein a massage in the Virgin Islands?</p> <p>14 A. I have.</p> <p>15 Q. Have you ever seen anyone give</p> <p>16 Mr. Epstein a massage in Paris?</p> <p>17 A. No, I don't recall seeing that.</p> <p>18 Q. Have you ever seen anyone give</p> <p>19 Mr. Epstein a massage on an airplane?</p> <p>20 A. No.</p> <p>21 Q. Have you ever seen anyone give</p> <p>22 Mr. Epstein a massage anywhere other than his</p> <p>23 home in Palm Beach or in the Virgin Islands?</p> <p>24 A. I'm sorry, can you just repeat the</p> <p>25 question?</p>
<p>1 G. Maxwell - Confidential</p> <p>2 [REDACTED]</p> <p>5 Q. Did you provide massages to</p> <p>6 Mr. Epstein?</p> <p>7 A. No.</p> <p>8 Q. What?</p> <p>9 A. No.</p> <p>10 Q. Were you ever present when anyone</p> <p>11 provided a massage to Mr. Epstein?</p> <p>12 MR. PAGLIUCA: Object to the form</p> <p>13 and foundation.</p> <p>14 A. I have seen people give Mr. Epstein</p> <p>15 massages. I have seen him on a massage</p> <p>16 table. I have seen that.</p> <p>17 Q. Have you seen someone other than</p> <p>18 yourself give Mr. Epstein a massage at his</p> <p>19 home in New York?</p> <p>20 A. I can't recall seeing him in the</p> <p>21 massage room in New York, no.</p> <p>22 Q. I'm not asking whether you recall</p> <p>23 seeing him in the massage room in New York.</p> <p>24 I'm asking you whether you have ever seen</p> <p>25 someone other than yourself give Mr. Epstein</p>	<p>1 G. Maxwell - Confidential</p> <p>2 Q. Have you ever seen anyone give</p> <p>3 Mr. Epstein a massage anywhere other than in</p> <p>4 his home in Palm Beach or in the Virgin</p> <p>5 Islands?</p> <p>6 A. No, I can't think of anyplace.</p> <p>7 Q. Have you ever seen anyone give</p> <p>8 Mr. Epstein a massage when Mr. Epstein was</p> <p>9 not clothed?</p> <p>10 A. Sorry, can you repeat the question?</p> <p>11 Q. Have you ever seen anyone give</p> <p>12 Mr. Epstein a massage when Mr. Epstein was</p> <p>13 not clothed?</p> <p>14 A. I think when Mr. Epstein received</p> <p>15 massages, he never had clothes on.</p> <p>16 Q. Who did you see give Mr. Epstein a</p> <p>17 massage?</p> <p>18 A. I can't recall the "whos" because I</p> <p>19 don't really remember, but I have seen him</p> <p>20 receive massages from professional adult</p> <p>21 masseuses that I have seen him receive</p> <p>22 massages.</p> <p>23 Q. When you say professional adult</p> <p>24 masseuses, what are you referring to?</p> <p>25 A. I just want to be sure that we</p>

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<p>1        G. Maxwell - Confidential      2 understand that the times I have seen him      3 receive a massage it's been by somebody who      4 is an adult, clearly an older person. I      5 don't know if they're professional, but an      6 older person appearing to be a professional      7 masseuse.</p> <p>8        Q. What led you to believe that the      9 person giving the massage was a professional      10 masseuse?</p> <p>11      A. Because the massages that I      12 witnessed looked professional. I don't know      13 how to -- I'm defining it as opposed to the      14 ones from where people ask me inappropriate      15 questions, I couldn't answer, but these are      16 people who would be clothed giving a      17 professional massage, it appeared to be a      18 professional massage, as opposed to any other      19 type of massage.</p> <p>20      Q. Have you ever had what you refer to      21 as a professional massage?</p> <p>22      A. I have.</p> <p>23      Q. Have you ever had what you refer to      24 as a professional massage in any of Mr.      25 Epstein's homes?</p>	<p>1        G. Maxwell - Confidential      2 as professional massages, you were clothed or      3 unclothed?</p> <p>4        A. Unclothed.</p> <p>5        Q. Completely unclothed?</p> <p>6        A. Typically when you receive a      7 massage you are not clothed, so I was      8 unclothed, as is the norm in a massage      9 situation.</p> <p>10      Q. That is, you didn't have any      11 clothes on, is that the case?</p> <p>12      A. Generally, what happens is you are      13 not wearing any clothes and you have a towel      14 or sheet that covers you while you are      15 receiving the massage, so I would be covered      16 always, but underneath the sheet or towel, I      17 would not be wearing any clothing.</p> <p>18      Q. Are you saying that the massage was      19 through the sheet?</p> <p>20      A. Well, in some instances, yes.</p> <p>21      Q. It is your testimony that when you      22 received what you referred to as professional      23 massages, the masseuse didn't touch your      24 skin, only touched the sheet?</p> <p>25      MR. PAGLIUCA: Object to the form</p>
Page 31	Page 33
<p>1        G. Maxwell - Confidential      2        A. I have.</p> <p>3        Q. Did you ever have what you refer to      4 as a professional massage in Mr. Epstein's      5 home in New York?</p> <p>6        A. I don't recall, but I think I have,      7 but I don't recall. I must have, but I don't      8 recall.</p> <p>9        Q. Did you ever have what you refer to      10 as a professional massage in Mr. Epstein's      11 home in Palm Beach?</p> <p>12      A. I did.</p> <p>13      Q. Did you ever have what you refer to      14 as a professional massage in Mr. Epstein's      15 home in New Mexico?</p> <p>16      A. I did.</p> <p>17      Q. Did you ever have what you refer to      18 as a professional massage in Mr. Epstein's      19 home in Paris?</p> <p>20      A. I did.</p> <p>21      Q. Did you ever have what you refer to      22 as a professional massage in the Virgin      23 Islands?</p> <p>24      A. I did.</p> <p>25      Q. When you had what you referred to</p>	<p>1        G. Maxwell - Confidential      2 and foundation.</p> <p>3        A. I didn't say that. I said in some      4 instances, some massages are where you don't      5 touch the skin, so I have received massages      6 where I don't get touched, especially if it's      7 just pressure, so it's through a sheet, but I      8 have also received massages where you are      9 touched and the sheet is just there for      10 modesty.</p> <p>11      Q. Have you ever received what you      12 referred to as a professional massage when      13 anyone else was in the room other than the      14 person that you are referring to as a      15 professional masseuse?</p> <p>16      MR. PAGLIUCA: Object to the form      17 and foundation.</p> <p>18      A. Can you repeat the question,      19 please?</p> <p>20      Q. Have you ever received a massage      21 when anyone was in the room other than the      22 person that you refer to as a professional      23 masseuse?</p> <p>24      MR. PAGLIUCA: Same objection.</p> <p>25      A. I am entirely possible that in the</p>

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<p>Page 34</p> <p>1 G. Maxwell - Confidential      2 course of receiving a massage someone would      3 come in and sit and chat to me while I was      4 getting a massage, a friend would come in.      5 That has happened.</p> <p>6 Q. Do you recall that happening?      7 A. Not with specificity, I can't think      8 of it actually, but I know that I've had      9 friends come in and we've talked and as I got      10 a massage, that has happened.</p> <p>11 Q. Have you ever received a massage      12 when Mr. Epstein was present?      13 A. He has entered the room and gave me      14 a message or asked me a question, that has      15 happened.</p> <p>16 Q. Have you ever received a massage      17 when Mr. Epstein was in the room other than      18 just to come in to give you a message or ask      19 you a question?</p> <p>20 MR. PAGLIUCA: Object to the form      21 and foundation.      22 A. Not that I recall.      23 Q. Did you ever participate in      24 arranging for anyone to give Mr. Epstein a      25 massage?</p>	<p>Page 36</p> <p>1 G. Maxwell - Confidential      2 home to give him a massage, other than      3 someone who had previously given you a      4 massage?      5 A. No, I don't think so. No, I don't      6 think so.      7 Q. Is it your testimony that everyone      8 that you arranged to come to Mr. Epstein's      9 home to give Mr. Epstein a massage was      10 somebody you had already had a massage from?      11 A. No, that is not my testimony. I      12 don't recall -- there were definitely      13 instances where I had a massage and -- so      14 what you are asking me was if anyone came to      15 the house to give him a massage that I had      16 not had a massage from myself?      17 Q. It's a little different than that.      18 A. Okay.      19 Q. You've testified that you arranged      20 for some people to come to Mr. Epstein's home      21 to give him a massage, correct?      22 A. Yes.      23 Q. And at one point, I thought you had      24 testified that before you arranged to have      25 people come to give Mr. Epstein a massage,</p>
<p>Page 35</p> <p>1 G. Maxwell - Confidential      2 A. Part of my duties and my job -- can      3 you repeat the question so I understand, and      4 I give you the right answer exactly.      5 Q. Did you ever participate in      6 arranging for anyone to give Mr. Epstein a      7 massage?      8 A. Part of my professional      9 responsibilities, I did, and I've testified      10 previously, go to spas and other professional      11 areas and received massages from people in      12 these places, and if I felt that person was      13 good or I had had a good massage, I had asked      14 if they do home visits.      15 In that capacity, I had, people did      16 come to the house in that capacity, that I      17 thought were good.      18 Q. Did you ever arrange for anyone to      19 give Mr. Epstein a massage or to come to his      20 home to give him a massage, other than      21 someone who had previously given you a      22 massage?      23 A. Sorry, can you repeat the question?      24 Q. Did you ever arrange for anyone to      25 give Mr. Epstein a massage or to come to his</p>	<p>Page 37</p> <p>1 G. Maxwell - Confidential      2 you had -- you didn't use the word tested      3 them out, but that you had previously gotten      4 them to give you a massage so that you could      5 see how good they were, is that fair to say?      6 A. If I thought they were -- if I      7 thought it was a good massage, yes, that is      8 my testimony.      9 Q. What I had thought, and what I'm      10 now asking you is that everyone who you      11 arranged to come to Mr. Epstein's home to      12 give him a massage was somebody who you had      13 already had a massage from, is that fair?      14 A. Typically, yes, but that wasn't      15 exclusively. So I know that friends of mine,      16 for instance, would have a masseuse or      17 masseur that they thought was very good, and      18 they said this is a very good person.      19 So it is possible, and I'm pretty      20 sure sometimes on recommendations of other      21 people, that without me having a massage from      22 them, that they may have come to the house.      23 So I could not testify that every single      24 person that came to the house I received a      25 massage from, because that would not be true.</p>

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<p>1        G. Maxwell - Confidential</p> <p>2        Q. Was every person who you arranged 3 to come to Mr. Epstein's house to give a 4 massage someone who either you had already 5 had a massage from or you had a friend who 6 recommended them as a good professional 7 masseuse?</p> <p>8        MR. PAGLIUCA: Object to the form 9 and foundation.</p> <p>10      A. Typically, that is how that would 11 work.</p> <p>12      Q. Was there ever anyone who you 13 arranged to come to Mr. Epstein's house to 14 give him a massage, someone who you had not 15 previously gotten a massage from yourself or 16 received a recommendation from one of your 17 friends that it was a good professional 18 masseuse?</p> <p>19      MR. PAGLIUCA: Object to the form 20 and foundation.</p> <p>21      A. I cannot think of anyone that would 22 fit that category.</p> <p>23      Q. You made a point in a previous 24 answer of referring to people as adult 25 masseuses. Do you recall that?</p>	<p>Page 38</p> <p>1        G. Maxwell - Confidential</p> <p>2        A. I know what the allegations are, 3 and I am aware of those, but as to my actual 4 knowledge of somebody under the age of 21, I 5 can't say that I know, I can't think of 6 anybody. I know Virginia has obviously made 7 those claims and she was 17 when he met her, 8 but other than her, I cannot think of 9 anybody.</p> <p>10      Q. Insofar as you are aware, did 11 Virginia ever give Mr. Epstein a massage?</p> <p>12      A. I know she said she did and I 13 believe she may have, but I don't ever see 14 her giving him a massage, so I can't say.</p> <p>15      Q. Leaving aside any information that 16 you have that has come from Virginia in the 17 last decade?</p> <p>18      A. Right.</p> <p>19      Q. Going back to the time when 20 Virginia was less than 21, at that period of 21 time, did you believe that Virginia was 22 giving Mr. Epstein massages?</p> <p>23      A. I do think she was giving him 24 massages.</p> <p>25      Q. Is it your testimony that the only</p>
<p>Page 39</p> <p>1        G. Maxwell - Confidential</p> <p>2        A. I do.</p> <p>3        Q. When you refer to someone as an 4 adult masseuse, what are you referring to?</p> <p>5        A. I think everybody in this room is 6 an adult.</p> <p>7        Q. I don't necessarily disagree with 8 that, but what I'm asking you, since I can't 9 carry all these people with me every time 10 somebody reads this transcript, is what do 11 you mean by an adult?</p> <p>12      A. Well, I think an adult is somebody 13 who looks older and professional and is 14 someone who has lived some life and looks 15 like any one of us in this room do, some a 16 little older and some a little younger.</p> <p>17      Q. You are aware that there are 18 assertions that Mr. Epstein had massages from 19 females under the age of 21?</p> <p>20      A. I am aware of that.</p> <p>21      Q. Insofar as you are aware, did 22 Mr. Epstein ever have a massage from anyone 23 under the age of 21?</p> <p>24      MR. PAGLIUCA: Object to the form 25 and foundation.</p>	<p>Page 41</p> <p>1        G. Maxwell - Confidential</p> <p>2        female that you had any reason to believe was 3 under 21 who was giving Mr. Epstein massages 4 was Virginia?</p> <p>5        MR. PAGLIUCA: Object to the form 6 and foundation.</p> <p>7        A. First of all, I didn't know how old 8 Virginia was, so other than Virginia, so I 9 can't say, but other than -- I was not aware 10 of anybody else, no.</p> <p>11      Q. You first met Virginia when?</p> <p>12      A. I don't know.</p> <p>13      Q. Approximately?</p> <p>14      A. I believe it was in 2000, but now 15 I'm going off the knowledge that I have, not 16 from memory, so I met her the end of 2000 17 apparently.</p> <p>18      Q. And when you met Virginia in 2000, 19 how old did you think she was?</p> <p>20      MR. PAGLIUCA: Object to the form 21 and foundation.</p> <p>22      A. I didn't think about how old she 23 was. I don't recall the actual meeting of 24 Virginia, so I can't say, but I think she was 25 at least, I thought she was a professional</p>

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<p>1        G. Maxwell - Confidential      2        masseuse as far as I can recall today, so      3        that would have made her, I thought that      4        would have made her, to work in a spa, I      5        didn't think about, and I, I thought she      6        appeared to be a professional masseuse.      7        Q. Remember questions a while ago      8        where you made a big point about people being      9        adult masseuses?      10      A. Right, yeah.      11      Q. When you met Virginia for the first      12     time --      13      A. Right.      14      Q. -- did you think she was an adult      15     masseuse, as you use that term?      16      A. I don't recall actually meeting      17     Virginia at the time, and in fact, were it      18     not for this case, I'm not sure I would      19     recall her at all.      20      Q. But you do recall knowing Virginia?      21      A. I do, yes.      22      Q. You do recall knowing that Virginia      23     was giving Mr. Epstein massages, correct?      24      MR. PAGLIUCA: Object to the form      25     and foundation.</p>	<p>1        G. Maxwell - Confidential      2        thought. I really don't recall her, so it's      3        hard for me to testify what I thought about      4        her age at the time.      5        Q. Was Virginia, in the period of      6        around 2000, the youngest person that, as you      7        understood it, was giving Mr. Epstein      8        massages?      9        MR. PAGLIUCA: Object to the form      10      and foundation.      11      A. Again, I can't testify to her age,      12     but everybody else that I can recall seemed      13     to be again, like I would say, adults.      14      Q. You didn't think Virginia was an      15     adult, did you?      16      MR. PAGLIUCA: Object to the form      17      and foundation.      18      A. Like I said, I don't recall her. I      19     don't recall thinking about -- my memory is      20     of adults giving Jeffrey massages, and as I      21     don't really remember Virginia around that      22     time, I don't know what I think.      23      Q. You do remember Virginia, about      24     that time back in the 2000s, giving      25     Mr. Epstein massages?</p>
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<p>1        G. Maxwell - Confidential      2        A. I believe she was, but I can't say      3        for sure.      4        Q. Why do you believe Virginia was      5        giving Mr. Epstein massages?      6        A. Today, because -- but back then.      7        Q. Back then?      8        A. Because at some point she would      9        have been going to the massage room to give      10      massages.      11      Q. Back then, in the period around      12     2000?      13      A. Right.      14      Q. You believed that Virginia was      15     giving Mr. Epstein massages, correct?      16      A. I believe I did, yes.      17      Q. At the time back in the period      18     around 2000 that you believe that Virginia      19     was giving Mr. Epstein massages, how old did      20     you think Virginia was at the time?      21      MR. PAGLIUCA: Object to the form      22      and foundation.      23      A. I don't believe that I -- I don't      24     know what I thought at the time. It's a long      25     time ago and I just have no idea what I</p>	<p>1        G. Maxwell - Confidential      2        MR. PAGLIUCA: Object to the form      3        and foundation.      4        A. I barely remember her at all.      5        Q. Whether you barely remember her or      6        not, you do remember that back in the period      7        around 2000, Virginia was giving Mr. Epstein      8        massages, right?      9        MR. PAGLIUCA: Objection to form      10      and foundation.      11      A. Only in the most general terms. It      12     would be somebody who would give him a      13     massage, and that's it.      14      Q. During the period of time back in      15     the period around 2000, when you knew that      16     Virginia was somebody who would give      17     Mr. Epstein a massage, was she somebody who      18     you considered an adult?      19      MR. PAGLIUCA: Objection to form      20      and foundation.      21      A. I didn't consider her at all      22     because she is not somebody that I really      23     interacted with.      24      Q. It is your testimony that Virginia      25     was not somebody that you interacted with, is</p>

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<p>1        G. Maxwell - Confidential 2 that what you're saying? 3        A. I said I didn't really interact -- 4 it's not that I didn't interact with her at 5 all, but not enough for her to make a very 6 strong and lasting impression. 7        Q. Is it your testimony that you 8 interacted with Virginia, but you didn't 9 really interact with Virginia?</p> <p>10      MR. PAGLIUCA: Objection to form 11 and foundation. 12      A. I don't understand what that 13 actually even means. 14      Q. You said that you interacted with 15 Virginia. Do you recall that? 16      A. In the most general terms, I do 17 recall her. 18      Q. And then you testified that you 19 didn't really interact with Virginia. Do you 20 recall saying that? 21      A. I consider this a real interaction. 22 I will not be forgetting this any time soon. 23 But the most casual of relationships, where 24 you say hello or to be nice or polite, or 25 offer someone a glass of water or something</p>	<p>1        G. Maxwell - Confidential 2        MR. PAGLIUCA: We've been going for 3 about an hour this morning. I think 4 you're probably aware that Ms. Maxwell 5 was deposed for a full seven hours on a 6 prior occasion. In my view, the court's 7 order is limited and we shouldn't be 8 covering ground that we covered in the 9 prior deposition. 10      At some point, we are going to need 11 to call the court, if we go at this 12 pace, for instruction about length of 13 time here, because my view is that this 14 is not supposed to be a seven-hour 15 deposition, you are not supposed to be 16 covering old ground, and you should be 17 asking questions related to the, what I 18 characterize as the eight discreet areas 19 related to a, quote, sexual activity 20 which precedes all of the eight items in 21 the court's order of July 10th. 22      We spent a lot of time not talking 23 about those issues, and I suggest we get 24 to it or we get the court on the phone 25 for some guidance about timing here.</p>
<p>Page 47</p> <p>1        G. Maxwell - Confidential 2 is what I would term a casual interaction. 3 It is not something that, from what are we 4 talking, 17, 18 years ago, something that 5 really sticks out in my mind. 6        Q. Is it your testimony that your only 7 relationship with Virginia was what you 8 referred to as a casual relationship where 9 you might say hello or offer a glass of water 10 to be polite? 11      MR. PAGLIUCA: Objection to form 12 and foundation. 13      A. Generally, yes, that's how I would 14 characterize. 15      MR. PAGLIUCA: We've been going for 16 about an hour. I would like to take a 17 break. 18      MR. BOIES: Certainly. 19      THE VIDEOGRAPHER: The time is 20 10:01 a.m., and we are going off the 21 record. 22      (Recess.) 23      THE VIDEOGRAPHER: The time is 24 10:10 a.m., and we are back on the 25 record. This also begins DVD No. 2.</p>	<p>Page 49</p> <p>1        G. Maxwell - Confidential 2        MR. BOIES: I'm happy to get the 3 court on the phone any time you like. I 4 think the questions clearly relate to 5 sexual activity. 6        MR. PAGLIUCA: How old Virginia 7 Roberts was or not does not relate to 8 sexual activity. Her memory of how old 9 Virginia Roberts may or may not have 10 been does not relate to sexual activity, 11 and it was all asked and answered in the 12 prior deposition. 13      MR. BOIES: Your witness introduced 14 the subject, asserting that all of these 15 people were adults. I didn't ask 16 whether they were adults at that time. 17 I simply asked a general question that 18 was expressly covered by the judge's 19 order. Your client opened the door, 20 volunteered this and made it necessary 21 to do this. 22      I am happy to go to the court any 23 time you want, and I'm happy to go over 24 with the court some of these questions 25 and put it in context for the court with</p>

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<p>1        G. Maxwell - Confidential      2 respect to what the documentary evidence      3 is. I'm happy to do that any time you      4 want.      5        MR. PAGLIUCA: Let's get on with it      6 and ask some questions that are relevant      7 to what the court ordered here.      8        MR. BOIES: I am asking questions      9 that I think are clearly relevant. If      10 you don't think so, I invite you to take      11 it to the court. If not, then let me      12 get on with my questions. Any time that      13 I get to a point where you think you      14 want to stop the deposition and go to      15 the court, I am more than prepared to do      16 that.</p> <p>17 BY MR. BOIES:      18        Q. Ms. Maxwell, during the break, did      19 you have conversations with anyone?      20        A. My lawyers.      21        Q. What did your lawyers say to you?      22        MR. PAGLIUCA: Don't answer that      23 question.      24        Q. What did you say to your lawyer?      25        MR. PAGLIUCA: Don't answer that</p>	<p>1        G. Maxwell - Confidential      2                    MR. PAGLIUCA: Don't answer that      3 question.      4        Q. Did you have conversations with anyone other than your lawyer during the      5 break?      6        A. No.      7        Q. Did your lawyer tell you why he had      8 taken a break?      9                    MR. PAGLIUCA: Don't answer that      10 question.      11                    I don't think I did, by the way.      12        MR. BOIES: I'm happy to depose you      13 about it, if you want.      14        MR. PAGLIUCA: Sure.      15        MR. BOIES: I'm serious about that.      16 I'm happy to put you under oath right      17 now, and if you want to start talking      18 about what you did or did not do, I'm      19 happy to interrupt this deposition, put      20 you under oath and let you testify.      21        MR. PAGLIUCA: Ask a question.      22        MR. BOIES: I'm telling you.      23 Otherwise, I suggest you stop making      24 speeches.      25</p>
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<p>1        G. Maxwell - Confidential      2 question.      3        Q. Did you ask your lawyer for any      4 legal advice?      5        MR. PAGLIUCA: Don't answer that      6 question.      7        Q. Did your lawyer give you any legal      8 advice?      9        MR. PAGLIUCA: Don't answer that      10 question.      11        MR. BOIES: These are all yes or no      12 questions.      13        MR. PAGLIUCA: She is not answering      14 any of those questions, Mr. Boies.      15        Q. Did your lawyer give you advice as      16 to how to answer the questions I was asking?      17        MR. PAGLIUCA: Don't answer that      18 question.      19        Q. Did your lawyer tell you that you      20 were creating problems for yourself with some      21 of your answers?      22        MR. PAGLIUCA: Don't answer that      23 question.      24        Q. Did your lawyer suggest how you      25 might answer some of my questions?</p>	<p>1        G. Maxwell - Confidential      2                    MR. PAGLIUCA: Why don't we both      3 stop making speeches.      4        BY MR. BOIES:      5 [REDACTED]</p>

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1 G. Maxwell - Confidential  
2 [REDACTED]

1 G. Maxwell - Confidential  
2 [REDACTED]

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1 G. Maxwell - Confidential  
2 Epstein's home in Palm Beach?  
3 MR. PAGLIUCA: Objection to form  
4 and foundation.  
5 [REDACTED]

1 G. Maxwell - Confidential  
2 MR. PAGLIUCA: Objection to form  
3 and foundation.  
4 [REDACTED]

8 MR. PAGLIUCA: Objection to form  
9 and foundation.  
10 [REDACTED]

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1 G. Maxwell - Confidential  
2 [REDACTED]

21 MR. PAGLIUCA: Objection to form  
22 and foundation.  
23 [REDACTED]

1 G. Maxwell - Confidential  
2 [REDACTED]

1 G. Maxwell - Confidential  
2 [REDACTED]

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1 G. Maxwell - Confidential  
2 [REDACTED]

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1 2	G. Maxwell - Confidential 	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	G. Maxwell - Confidential Q. You were aware of how many people gave Mr. Epstein massages? MR. PAGLIUCA: Objection to form and foundation. A. I was not with him actually very often. I was frequently -- we were frequently not together, so I couldn't know what he would be doing when I wasn't with him. But when we were together, the behavior as described as alleged did not happen, so he would have one massage a day, that would be it. Q. So insofar as you were aware and when you were with Mr. Epstein, he only had one massage a day? A. Yeah. Q. Other than Virginia Roberts, as you understood it at the time, were any of the people that gave Mr. Epstein massages women who were under 21? MR. PAGLIUCA: Objection to form and foundation. A. I don't know what the ages were of	
1 2	G. Maxwell - Confidential 	Page 63	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	G. Maxwell - Confidential the people who were giving him massages, but I believe they were professional masseuses. Q. I think you testified that you believe that Virginia Roberts was a professional masseuse, is that correct? MR. PAGLIUCA: Objection to form and foundation. A. Based on how allegedly we met, which was at a spa, I believe that when you work at a spa, you are a professional. So I'm basing my statement based on her working as a professional massage person, at a professional spa. Q. When you met Ms. Roberts at the spa, what spa was it? MR. PAGLIUCA: Objection to form and foundation. A. I don't recall the actual meeting, but based on all the evidence and stories, it was at Mar-a-Lago. Q. You just testified that you met Virginia Roberts at a spa. Do you recall that? MR. PAGLIUCA: Objection to form

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<p>1        G. Maxwell - Confidential      2        and foundation.      3        A. I said I don't recall the actual      4        meeting, but based on the evidence that we      5        have been produced, and I now believe it was      6        at Mar-a-Lago that that meeting may have      7        taken place.      8        Q. When you met Virginia Roberts, did      9        you understand that she was at that time a      10      professional masseuse?</p> <p>11        MR. PAGLIUCA: Objection to form      12      and foundation.</p> <p>13        A. I don't recall the actual first      14      meeting, I don't know.</p> <p>15        Q. Whether or not you recall the      16      actual first meeting, was it your      17      understanding that Virginia Roberts was a      18      professional masseuse?</p> <p>19        MR. PAGLIUCA: Objection to form      20      and foundation.</p> <p>21        A. I had no idea at the time, but I      22      believe she was working at a spa, and based      23      on what I believe today, she was a masseuse      24      at Mar-a-Lago.</p> <p>25        Q. When you say based on what you</p>	<p>1        G. Maxwell - Confidential      2        conversations with Virginia. Like I said, I      3        would actually barely remember her at all      4        were it not for this case.      5        Q. Why, then, do you believe she was a      6        masseuse at Mar-a-Lago?      7        A. Based on having met her at      8        Mar-a-Lago. I don't know why else she would      9        be at the house.      10       Q. At what house?      11       A. Why would she come to Jeffrey's      12      house if she was not a masseuse at      13      Mar-a-Lago, why else would she come.      14       Q. Did you ask her to come to      15      Jeffrey's house?      16       A. I don't recall the first meeting or      17      how it went down that she came to give      18      Jeffrey a massage or whatever she came to do.      19       All I remember as I testified in my first      20      deposition is that her mother came and that      21      we sat outside and I talked to her mother,      22      and that she went in and met Jeffrey and then      23      she left. And then subsequent to that, I      24      understand she gave him massages.      25       Q. My question was a simple yes or no</p>
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<p>1        G. Maxwell - Confidential      2        believe today, you believe she was a masseuse      3        at Mar-a-Lago, what is it that you've learned      4        that leads you to believe she was a masseuse      5        at Mar-a-Lago?</p> <p>6        A. She worked at the spa, and that's      7        all I know, that she was 17 and that she held      8        herself out to be a masseuse.</p> <p>9        Q. She told you she was a masseuse?</p> <p>10       A. I don't know if she told me at the      11      time she was a masseuse. I believe today she      12      was a masseuse working at Mar-a-Lago and she      13      was 17 years old.</p> <p>14       Q. You said she held herself out as a      15      masseuse. Do you recall that?</p> <p>16       A. I just said it. The problem is I      17      don't recall with specificity. I don't      18      recall the actual meeting, so events in my      19      mind are conflated with all of her stories,      20      all of the lies that have been told.</p> <p>21       So, today, I believe that she was a      22      17-year-old masseuse at Mar-a-Lago.</p> <p>23       Q. Did she ever tell you that she was      24      a masseuse at Mar-a-Lago?</p> <p>25       A. I don't recall specific</p>	<p>1        G. Maxwell - Confidential      2        question. Did you ask her to come to      3        Jeffrey's house?      4        A. I can't recall exactly the meeting.      5        Q. In response, I got a paragraph that      6        makes a number of assertions that I'm now      7        going to have to follow-up. I'm prepared to      8        do that, but in light of your counsel's      9        desire to move the deposition along, I won't      10       have to follow-up things that you volunteer      11       if you don't volunteer them.      12       So if you will focus on my      13      question, and if it is simply a yes or no      14      answer and you give a yes or no answer, that      15      will shorten the deposition. If you want to      16      say other things, I'm not going to try to      17      stop you, but I am going to follow-up on what      18      you say.      19       My question now is simply, do you      20      recall, one way or the other, as you sit here      21      now, whether you asked Virginia Roberts to      22      come to Mr. Epstein's house?      23       A. I do not.      24       Q. Do you recall, as you sit here now,      25      one way or another, whether Virginia Roberts</p>

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<p>1        G. Maxwell - Confidential      2        was a masseuse, a towel girl, a maintenance      3        person or any other type employee at      4        Mar-a-Lago?      5        A. I do not.      6        Q. Did Mr. Epstein ever ask you to      7        attempt to obtain or secure people to give      8        him massages that were not professional      9        masseuses?      10      A. No.      11      Q. Do you remember somebody by the      12     name of [REDACTED]      13      A. I don't believe I ever met him.      14      Q. You don't believe you ever met him?      15      A. No.      16      Q. Do you remember anyone other than      17     yourself who secured or obtained people to      18     give Mr. Epstein massages?      19      MR. PAGLIUCA: Objection to form      20     and foundation.      21      A. Can you ask the question again,      22     please?      23      Q. Do you remember anyone other than      24     yourself who secured or obtained people to      25     give Mr. Epstein massages?</p>	<p>1        G. Maxwell - Confidential      2        covered extensively.      3        MR. BOIES: I understand what the      4        prior deposition --      5        A. Other than friends of my family and      6        friends of other people's people, and the      7        people that I've identified, I am aware that      8        Jeffrey had friends that came over that      9        brought their kids with them from time to      10      time.      11      Q. These kids that you refer to, they      12     didn't give Mr. Epstein massages, did they?      13      MR. PAGLIUCA: Mr. Boies, this has      14     been asked and answered already.      15      MR. BOIES: I don't think that      16     particular question was asked and      17     answered, but whether it was asked and      18     answered or not, you can instruct not to      19     answer and then we will move on. I      20     think we take much more time with your      21     interjections than we would if you      22     simply let the witness answer the      23     question.      24      MR. PAGLIUCA: Well, we do, but      25     then we go down this road where you keep</p>
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<p>1        G. Maxwell - Confidential      2        MR. PAGLIUCA: Objection to form      3        and foundation.      4        A. I believe Jeffrey did get massages      5        from other people who were recommendations      6        from other people for massages that had      7        nothing to do with me.      8        Q. Do you know who?      9        A. I only know what I read. Virginia      10      gave people.      11      Q. Other than what Virginia had said      12      in the last 10 years, were you aware of      13      anyone who was obtaining people to give      14      Mr. Epstein massages other than yourself?      15      A. I'm not -- I don't know what other      16      people do. I know that other people      17      recommended massages to him, but I can't      18      testify to what other people do for him or      19      did for him.      20      Q. Back in the 1990s and the 2000s,      21      did you see women under the age of 21 at      22      Mr. Epstein's houses?      23      MR. PAGLIUCA: This has been asked      24      and answered in her prior deposition.      25      Do you understand that? It's been</p>	<p>1        G. Maxwell - Confidential      2        asking these questions that have already      3        been asked and answered.      4        So the witness can answer the      5        question, but let's stick to the topic      6        here.      7        MR. BOIES: If you want to instruct      8        her not to answer, instruct her not to      9        answer. You are not going to convince      10      me with speeches.      11      A. What is the question, please?      12      Q. You referred to friends of      13      Mr. Epstein bringing their kids with them      14      when they came over?      15      A. Yes.      16      Q. Those kids, as you described, did      17      not give Mr. Epstein massages, correct?      18      A. I don't believe so.      19      Q. Limiting the people that we're      20      talking about just to people who gave      21      Mr. Epstein massages or who were brought to      22      the home to give Mr. Epstein massages, were      23      there people other than you who were      24      responsible for bringing those people to Mr.      25      Epstein's house?</p>

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1 G. Maxwell - Confidential 2 MR. PAGLIUCA: Objection to form 3 and foundation. 4 A. I have no idea. 5 [REDACTED]		1 G. Maxwell - Confidential 2 Q. Where did she go to massage school? 3 A. I don't know. 4 Q. When did she go to massage school? 5 A. I don't know. 6 Q. Did she tell you she went to 7 massage school? 8 A. I don't recall. 9 Q. Did someone else tell you she went 10 to massage school? 11 A. I don't recall. It's my belief she 12 went to massage school and became a 13 professional masseuse at some point. 14 Q. What is your belief based on? 15 A. I don't know why, it's just 16 something, I must have had a conversation 17 with her, I think, about it, but I don't 18 recall specifically the conversation. Just 19 in general terms, that's what I believe. 20 Q. Is it your testimony that she told 21 you in general terms in a conversation that 22 she had gone to massage school? 23 A. I don't recall a specific 24 conversation, but that is my general 25 impression.
12 Q. Did [REDACTED] ever give Mr. Epstein a 13 massage? 14 A. I believe she did. 15 Q. Did she ever give you a massage? 16 A. She did. 17 Q. Was she what you referred to as a 18 professional masseuse? 19 A. I would. 20 Q. Had she ever worked in a spa? 21 A. I don't know if she worked in a 22 spa. 23 Q. Had she ever, prior to giving you 24 and Mr. Epstein massages, had she ever given 25 massages to other people?	Page 75	1 G. Maxwell - Confidential 2 Q. Do you know how long she was in 3 massage school? 4 A. I don't. 5 Q. Did Mr. Epstein ask her to go to 6 massage school? 7 A. I don't know. 8 Q. How old was [REDACTED] when she gave 9 you a massage? 10 A. Mid 20s, I believe. 11 Q. And was the timeframe in which she 12 gave Mr. Epstein a massage the same timeframe 13 she gave you a massage? 14 A. I really don't recall. I can only 15 recall her giving me massages. I know she 16 gave Mr. Epstein massages, but I don't recall 17 them. I know she gave me them, I know she 18 gave me massages. 19 Q. How old was she when she gave 20 Mr. Epstein massages? 21 A. I met her, I believe, when she was 22 in her mid 20s, it would have been in her 23 mid 20s. 24 Q. Did Mr. Epstein, insofar as you 25 believe, engage in sexual activities with

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<p>1 G. Maxwell - Confidential 2 [REDACTED] 3 A. I would not know. I would say no. 4 Q. Did you engage in sexual activities 5 with [REDACTED] 6 A. No. 7 Q. Do you know how [REDACTED] came to 8 know Mr. Epstein? 9 A. I met her at her university [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 A. In Palm Beach. 13 Q. At Mr. Epstein's home in Palm 14 Beach? 15 A. Yes. 16 Q. So is it fair to say tha [REDACTED] 17 [REDACTED]</p> <p>20 MR. PAGLIUCA: This has already 21 been testified to Mr. Boies. We are 22 repeating testimony now.</p> <p>23 MR. BOIES: I think in the context 24 of the witness' answers, these are fair 25 questions.</p>	<p>Page 78</p> <p>1 G. Maxwell - Confidential 2 instructed that the right way to do it 3 was to bring any issue to him after the 4 conclusion of the deposition. 5 The question that has been raised 6 is whether we should interrupt the 7 deposition now and seek guidance of the 8 court before continuing the deposition. 9 My view is that the deposition 10 needs to continue, and the counsel for 11 the defendant can instruct not to answer 12 and any questions that are instructed 13 not to answer can be brought to the 14 court, but I would not consent to 15 terminating the deposition at this 16 point. 17 MR. PAGLIUCA: I don't know if it's 18 a matter of consent or not. If I move 19 for a protective order, the deposition 20 is over and we can go litigate it in 21 front of Judge Sweet. We are here and 22 I'd like to complete this deposition 23 because this case needs to move along, 24 and quite frankly, I don't want to spend 25 money coming back here to do this again</p>
<p>1 G. Maxwell - Confidential 2 Now, I've asked you before, if you 3 want to instruct her not to answer, if 4 you want to go to the judge, we are 5 happy to do that, but I would suggest, 6 in the interest of moving it along, that 7 you stop these speeches. 8 MR. PAGLIUCA: You are not moving 9 it along is the problem, so maybe we 10 should call the court and get some 11 direction here, because I am not going 12 to sit here and rehash the testimony we 13 already gave. 14 MR. BOIES: That's fine. 15 THE VIDEOGRAPHER: The time is 16 10:51 a.m. and we are going off the 17 record. 18 (Whereupon, an off-the-record 19 discussion was held.) 20 THE VIDEOGRAPHER: The time is 21 10:56 a.m. and we are going back on the 22 record. This begins DVD No. 3. 23 MR. BOIES: We have just had a call 24 with Judge Sweet's chambers, Judge Sweet 25 is not available and his chambers</p>	<p>Page 79</p> <p>1 G. Maxwell - Confidential 2 or argue this in front of Judge Sweet. 3 But I will simply start referring 4 you back to the transcript and 5 instructing the witness not to answer 6 when I think we are getting into some 7 things that have been asked and answered 8 already. 9 MR. BOIES: Exactly the procedure 10 that I have proposed from the beginning. 11 If you think a question is out of 12 bounds, instruct not to answer and we 13 will then let the judge decide it. 14 BY MR. BOIES: 15 Q. How did it happen, Ms. Maxwell, 16 that [REDACTED] 17 [REDACTED], ended up giving massages to you 18 and Mr. Epstein? 19 MR. PAGLIUCA: I'm going to 20 instruct you not to answer the question. 21 This has been previously, the subject of 22 your former deposition, it doesn't fall 23 into any of the categories ordered by 24 the court, and so you don't need to 25 answer that.</p>

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<p style="text-align: right;">Page 82</p> <p>1 G. Maxwell - Confidential      2 Q. Was [REDACTED] paid for the massages      3 that she gave you?      4 A. I didn't pay her, so I believe she      5 was paid.      6 Q. Who paid her?      7 A. I don't know who paid her.      8 MR. PAGLIUCA: Again, you've      9 already answered that there was no      10 sexual activity between yourself and      11 Mr. Epstein related to these massages.      12 That's record testimony today. That's      13 within the scope of the court's order.      14 The rest of this is outside the scope of      15 the court's order, and I instruct you      16 not to answer.</p> <p>17 MR. BOIES: You are taking the      18 position that as long as she said says      19 that a massage did not involve sexual      20 activity, we cannot ask about massages.      21 That's your view?</p> <p>22 MR. PAGLIUCA: On this particular      23 questioning, yes.</p> <p>24 BY MR. BOIES:      25 Q. Did Mr. Epstein pay [REDACTED] for the</p>	<p style="text-align: right;">Page 84</p> <p>1 G. Maxwell - Confidential      2 something the judge can decide, but a      3 question as to how much this young girl      4 was being paid for a "massage", I think      5 goes directly to the issue of sexual      6 activity.</p> <p>7 MR. PAGLIUCA: Here is the problem,      8 Mr. Boies, at the first deposition,      9 there were very limited instructions not      10 to answer and the witness was not told      11 not to answer questions about how much      12 people were paid or not paid or any of      13 those subject matters. The witness was      14 only instructed not to answer about      15 sexual activity concerning adults in the      16 home.</p> <p>17 None of this came up during the      18 deposition, and you just don't get a      19 chance to redo the deposition because      20 you feel like you want to.</p> <p>21 So the judge's order is in the      22 context of the instructions to the      23 witness not to answer in the first      24 deposition, which is simply sexual      25 activity involving adults, which was the</p>
<p style="text-align: right;">Page 83</p> <p>1 G. Maxwell - Confidential      2 massages that she gave Mr. Epstein?      3 MR. PAGLIUCA: You just asked this      4 question, and I told her not to answer.      5 I will tell her not to answer again for      6 the same reasons.</p> <p>7 Q. Do you know how much Mr. Epstein      8 paid Johanna to give massages?</p> <p>9 MR. PAGLIUCA: Same instruction to      10 the witness. Why do you believe this is      11 within the scope of the court's order?</p> <p>12 MR. BOIES: Because of the court's      13 reference to massages, and because I      14 think how much a girl [REDACTED]      15 [REDACTED] was paid to give a      16 "massage" goes to whether there actually      17 was or was not sexual activity involved.</p> <p>18 MR. PAGLIUCA: The witness has      19 testified there wasn't.</p> <p>20 MR. BOIES: Perhaps it will      21 surprise you, I think it should not,      22 that I do not believe in my deposition I      23 need to simply accept her      24 characterization without      25 cross-examination. Now, that's</p>	<p style="text-align: right;">Page 85</p> <p>1 G. Maxwell - Confidential      2 only area that the witness was precluded      3 from talking about in the first      4 deposition. So that's where we're at.</p> <p>5 MR. BOIES: I think that directly      6 misreads the judge's order, including      7 where it says: Defendant is ordered to      8 answer questions relating to defendant's      9 own sexual activity with or involving      10 Jeffrey Epstein, with or involving      11 plaintiff, with or involving underage      12 females, involving or including massage      13 with individuals defendant knew to be or      14 believed might become known to Epstein.</p> <p>15 MR. PAGLIUCA: All of it is      16 preceded by the word sexual activity.</p> <p>17 MR. BOIES: I think your point of      18 view is an interesting one, but we will      19 see what the judge rules on it.</p> <p>20 BY MR. BOIES:      21 [REDACTED]</p>

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1 G. Maxwell - Confidential  
2 and foundation.  
3 A.

8 MR. PAGLIUCA: Objection to form  
9 and foundation.

10 A. I don't know.

11 Q. Did any of them give you massages?

12 A. No.

13 Q.

17 MR. PAGLIUCA: Objection to form  
18 and foundation. Asked and answered.

19 A. No.

20 Q. Were they ever in the Virgin  
21 Islands?

22 MR. PAGLIUCA: Objection to form  
23 and foundation.

24 A. No.

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2

8 MR. PAGLIUCA: Objection to form  
9 and foundation.

10 A. I don't know.

11 Q. Did any of them give you massages?

12 A. No.

13 Q.

17 MR. PAGLIUCA: Objection to form  
18 and foundation. Asked and answered.

19 A. No.

20 Q. Were they ever in the Virgin  
21 Islands?

22 MR. PAGLIUCA: Objection to form  
23 and foundation.

24 A. No.

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24 MR. PAGLIUCA: Objection to form  
25 and foundation.

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1 2	G. Maxwell - Confidential	1 2	G. Maxwell - Confidential
	[REDACTED]		[REDACTED]
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	[REDACTED]	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	[REDACTED]

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<p>1 G. Maxwell - Confidential 2 [REDACTED] 3 A. I do. 4 MR. BOIES: Let me show you a 5 document that has been marked for 6 identification as Maxwell Deposition 7 Exhibit 27. 8 (Maxwell Exhibit 27, Article, 9 marked for identification, as of this date.) 10 MR. PAGLIUCA: I'm going to need a 11 moment to review this, counsel. 12 MR. BOIES: Sure. Let me know when 13 you are finished. 14 MR. PAGLIUCA: I will. 15 Okay. 16 BY MR. BOIES: 17 Q. Did you see this article prior to 18 the time I'm showing it to you? 19 A. No. 20 Q. This is the first time you have 21 seen this article? 22 A. Yes. 23 Q. When did you first meet [REDACTED] 24 MR. PAGLIUCA: You are not</p>	<p>Page 94</p> <p>1 G. Maxwell - Confidential 2 [REDACTED] 3 Q. Who was [REDACTED] 4 A. [REDACTED] 5 [REDACTED] 6 Q. [REDACTED] 7 [REDACTED] 8 A. Uh-huh. 9 Q. Who was [REDACTED] 10 A. [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 Q. Did you know [REDACTED] 14 A. I did. 15 Q. When did you first meet [REDACTED] 16 [REDACTED] 17 A. I don't recall. 18 Q. Did you see [REDACTED] at 19 Mr. Epstein's house in Palm Beach? 20 A. No, I don't think so. 21 Q. Where did you see [REDACTED] 22 A. I believe I met her in New York at 23 some point. 24 Q. Did you see [REDACTED] at 25 Mr. Epstein's house in New York?</p>
<p>1 G. Maxwell - Confidential 2 answering those questions. That has 3 nothing to do with what we're here for 4 today. We will take that up with the 5 judge, if we need to. 6 Q. Let me direct your attention to a 7 portion of this article. Did [REDACTED] ever 8 talk to you about women that she believed 9 Mr. Epstein had had sex with? 10 MR. PAGLIUCA: Don't answer that 11 question. We will take that up with the 12 judge. 13 MR. BOIES: Okay. 14 Q. Did [REDACTED] ever mention to you a 15 [REDACTED] 16 A. She did. 17 Q. Did [REDACTED] ever mention to you an 18 [REDACTED] 19 A. She did. 20 Q. When did [REDACTED] 21 A. She called me and asked me, I don't 22 know if she mentioned -- I want to take that 23 back. I don't know if she mentioned [REDACTED] 24 [REDACTED]. I think she just mentioned [REDACTED]</p>	<p>Page 95</p> <p>1 G. Maxwell - Confidential 2 A. I don't recall meeting her there, 3 but -- I may have, but I don't recall. 4 Q. Did you ever meet [REDACTED] 5 A. I did. 6 Q. Where did you meet [REDACTED] 7 A. She was in New Mexico. 8 Q. At Mr. Epstein's property in New 9 Mexico? 10 A. Yes. 11 Q. And did Mr. Epstein ever have sex 12 with [REDACTED] 13 A. I have no idea. 14 Q. Did Mr. Epstein ever engage in 15 sexual activities with [REDACTED] 16 A. I have no idea. 17 Q. Did Mr. Epstein ever engage in 18 sexual activities with [REDACTED] 19 A. I don't know, I don't think so. 20 Q. Did [REDACTED] ever work for 21 Mr. Epstein? 22 A. I don't know. 23 Q. Did [REDACTED] ever visit you at 24 your apartment? 25 A. I don't recall her ever coming.</p>

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1	G. Maxwell - Confidential	1 G. Maxwell - Confidential
2	Q. Did you ever fly on Mr. Epstein's	2 wrote about them is somebody who talked
3	plane with [REDACTED]	3 to this witness about it, and I think
4	A. I don't remember.	4 that this is more than easily understood
5	Q. Did you ever fly on Mr. Epstein's	5 cross-examination.
6	plane with [REDACTED]	6 MR. PAGLIUCA: Your question was,
7	A. I don't think so.	7 do you know whether or not [REDACTED]
8	Q. Did [REDACTED] ever give	8 [REDACTED].
9	Mr. Epstein a massage?	9 MR. BOIES: Yes. And if you let
10	A. I don't -- I have no idea.	10 her answer, you will see where it leads.
11	Q. Did [REDACTED]	11 If you won't let her answer, the judge
12	[REDACTED]	12 is going to determine it. And I just
13	A. I don't recall.	13 suggest to you that you stop these
14	Q. What did [REDACTED] tell you about	14 speeches and stop debating, because you
15	[REDACTED] when she talked to you?	15 are not going to convince me not to
16	MR. PAGLIUCA: You don't have to	16 follow-up on these questions. If you
17	answer that. That has nothing to do	17 can convince the court to truncate the
18	with the court's order and why we are	18 deposition, that's your right, but all
19	here.	19 you're doing is dragging this deposition
20	Q. Did [REDACTED]	20 out.
21	[REDACTED]	21 MR. PAGLIUCA: You have the
22	had said that Mr. Epstein had engaged	22 opportunity to give me a good faith
23	in sexual activities with her?	23 basis why you are asking these
24	A. She never said that.	24 questions.
25	Q. Excuse me?	25
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1	G. Maxwell - Confidential	1 G. Maxwell - Confidential
2	A. I don't recall ever hearing such a	2 MR. BOIES: I have given you a good
3	thing.	3 faith basis.
4	Q. You know [REDACTED], correct?	4 MR. PAGLIUCA: You haven't.
5	A. I do.	5 MR. BOIES: Then instruct not to
6	Q. Do you know whether or not [REDACTED]	6 answer.
7	[REDACTED]	7 MR. PAGLIUCA: I am giving you the
8	MR. PAGLIUCA: Can you tell me how	8 opportunity to say why you are asking
9	that relates to this order, counselor?	9 the question, and why I'm telling her
10	MR. BOIES: Yes, I think it goes	10 not to answer and I am entitled to know
11	directly to the sexual activity related	11 that.
12	to [REDACTED] and what Mr. Epstein was	12 MR. BOIES: You are not entitled to
13	doing with [REDACTED]	13 know why I'm asking the question. You
14	Again, you can instruct not to	14 are only entitled to know that it
15	answer.	15 relates to the subject matter that I am
16	MR. PAGLIUCA: I'm trying to	16 entitled to inquire about, and I don't
17	understand why you are asking these	17 think the judge is going to think that,
18	questions before I --	18 you know, where Mr. Epstein shipped
19	MR. BOIES: I'm asking these	19 [REDACTED] off to is outside the scope
20	questions because these are people who	20 of what I'm entitled to inquire about.
21	not only have been publicly written	21 THE WITNESS: Can we take a break?
22	about in terms of the sexual activity	22 MR. BOIES: Only if you commit not
23	that they were put into in connection	23 to talk to your counsel during the
24	with Mr. Epstein, but the person who	24 break.
25		25 THE WITNESS: That's ludicrous.

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1	G. Maxwell - Confidential	G. Maxwell - Confidential
2	MR. BOIES: You want a break to	a mother and her daughters who came from
3	talk to your counsel, right?	Phoenix. The oldest daughter, an artist,
4	THE WITNESS: I want to use the	whose character was vouchsafed to me by
5	bathroom.	several sources, including the artist, Eric
6	MR. BOIES: You want to talk to	Fischl, had told me weeping as she sat in my
7	your counsel, right?	living room, of how Epstein had attempted to
8	THE WITNESS: I talk to my counsel	seduce both her and separately and her
9	all the time.	younger sister, then only 16."
10	MR. BOIES: I don't want you	Did Ms. Ward tell you that?
11	talking to your counsel while I'm in the	A. No.
12	middle of this examination.	Q. Did Ms. Ward tell you that her
13	MR. PAGLIUCA: I'm going to talk to	information was that [REDACTED]
14	her, so are we going to sit here and go	[REDACTED]
15	for the rest of the day until we're	[REDACTED]
16	done?	A. No.
17	MR. BOIES: No, but I'm going to go	Q. Did you and Mr. Epstein visit [REDACTED]
18	through the rest of this line of	[REDACTED]
19	questioning, unless you take her and	A. I don't know I would characterize
20	walk out and then, I'm going to protest	the word visit with Mr. Epstein. We went for
21	that to the judge.	business in Ohio because [REDACTED]
22	MR. PAGLIUCA: He is refusing a	[REDACTED], and I accompanied him on a few
23	bathroom break to you right now.	visits.
24	MR. BOIES: No, I'm not. I'm happy	Q. Did you and Mr. Epstein go to Ohio,
25	to have her take a bathroom break as	and while you were in Ohio, see [REDACTED]
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1	G. Maxwell - Confidential	G. Maxwell - Confidential
2	long as she doesn't use it as an excuse	A. I believe actually that she was --
3	to get coached by her lawyer.	stayed at his house there, so I would have
4	THE WITNESS: For the record, I	seen her at the house. I believe I do recall
5	want to object strongly to that.	seeing her at the house, actually.
6	MR. PAGLIUCA: You don't talk now.	Q. When you say she stayed at the
7	Do you want to go to the bathroom?	house, you are referring to [REDACTED]
8	THE WITNESS: Yes.	A. Yeah, I think [REDACTED] was
9	MR. PAGLIUCA: How about if I stay	painting or something in Ohio, and he let her
10	here, Mr. Boies, will that work for you?	stay at a place that he had.
11	MR. BOIES: Absolutely.	Q. When you say "he" let her stay, you
12	THE VIDEOGRAPHER: The time is	are talking about [REDACTED]
13	11:31, and we are going off the record.	A. No, I'm talking about Jeffrey
14	(Recess.)	Epstein.
15	THE VIDEOGRAPHER: The time is	Q. So when you saw [REDACTED] in
16	11:34 a.m. and we are back on the	Ohio, it was your understanding that she was
17	record. This also begins DVD No. 4.	staying at property that Mr. Epstein had in
18	BY MR. BOIES:	Ohio, is that correct?
19	Q. Let me approach it this way. If	A. I don't know if it was his property
20	you turn to page 5 of 7 of the exhibit that	or he rented it, I don't know what the nature
21	is Vicky Ward's Daily Beast article. And if	was. It was a property that he had that she
22	you look at the third paragraph where Ms.	stayed at.
23	Ward writes: What I had "on the girls" were	Q. [REDACTED] was staying in Ohio at
24	some remarkably brave first-person accounts.	some property, and you don't know whose
25	Three on-the-record stories from the family,	property it was, is that fair?

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1 G. Maxwell - Confidential  
 2 A. I don't know what -- I don't know  
 3 who owned -- I don't know anything about the  
 4 ownership of the property or how Jeffrey had  
 5 it or why he stayed there, I don't know.

6 Q. Was it clear to you that Jeffrey  
 7 had arranged for [REDACTED] to stay at  
 8 wherever she was staying in Ohio?

9 MR. PAGLIUCA: Objection to form  
 10 and foundation.

11 A. I have no idea what the arrangement  
 12 was between [REDACTED] and Jeffrey.

13 Q. When you referred to the property  
 14 where [REDACTED] was staying, you said you  
 15 didn't know how Jeffrey had it?

16 A. What's your question?

17 Q. Was it your understanding that  
 18 Jeffrey did have that property that she was  
 19 staying at in some capacity or another,  
 20 either owning it or leasing it or having been  
 21 given it by a friend?

22 MR. PAGLIUCA: Objection to form  
 23 and foundation.

24 A. I have no idea.

25 Q. Where was this property that you

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 2 house in Columbus, Ohio, correct?  
 3 A. I don't know the arrangement that  
 4 [REDACTED] had with Jeffrey. I believe she  
 5 was painting there, but I was never aware of  
 6 the arrangement. I know that I saw her in  
 7 Ohio at a house.

8 Q. When you were with [REDACTED] at  
 9 this house in Columbus, Ohio, Mr. Epstein was  
 10 with you, correct?

11 A. I went to Ohio with him on  
 12 business, and we were at a house that he  
 13 could stay at and I stayed at, and I recall  
 14 [REDACTED] being at this house. That is  
 15 what I recall.

16 Q. When you went to Ohio with  
 17 Mr. Epstein, did you see [REDACTED] on more  
 18 than one occasion?

19 A. I don't recall.

20 Q. You saw [REDACTED] in Ohio with  
 21 Mr. Epstein on at least one occasion,  
 22 correct?

23 MR. PAGLIUCA: Objection to form  
 24 and foundation.

25 A. I recall seeing her in Ohio, but I

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1 G. Maxwell - Confidential  
 2 and Mr. Epstein visited [REDACTED] at in  
 3 Ohio?

4 MR. PAGLIUCA: Objection to form  
 5 and foundation.

6 A. It was in Columbus.

7 Q. Was it a house or an apartment?

8 A. It was a house.

9 Q. When you and Mr. Epstein visited  
 10 [REDACTED] at this house in Columbus, was  
 11 anyone else in the house?

12 A. I never visited [REDACTED] at the  
 13 house.

14 Q. Did you see [REDACTED] in Ohio?

15 A. I recall seeing her, but I didn't  
 16 visit. I didn't go to Ohio to see [REDACTED]

17 [REDACTED].

18 Q. When you went to Ohio, did you see  
 19 [REDACTED]

20 A. I recall seeing [REDACTED] in  
 21 Ohio.

22 Q. Where did you see her?

23 A. I recall seeing her at this house  
 24 that Jeffrey stayed at.

25 Q. [REDACTED] was staying in the

1 G. Maxwell - Confidential  
 2 couldn't tell you how many times I saw her.  
 3 For sure once, because I have a recollection  
 4 of seeing her once.

5 Q. And the house in which you and  
 6 Mr. Epstein and [REDACTED] were in  
 7 Columbus, Ohio, was that a house that you and  
 8 Mr. Epstein were staying in overnight?

9 A. I stayed overnight there.

10 Q. Was [REDACTED] staying there  
 11 overnight?

12 A. I don't recall.

13 Q. How many nights did you and  
 14 Mr. Epstein stay in this house in Columbus?

15 A. I don't recall.

16 Q. Was it more than one?

17 A. I don't recall.

18 Q. The night or nights that you and  
 19 Mr. Epstein stayed at this house in Columbus,  
 20 was [REDACTED] there?

21 A. I don't recall.

22 Q. When you saw [REDACTED] in Ohio,  
 23 did you talk to her?

24 A. I'm assuming I must have said

25 hello, so yes.

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<p>1 G. Maxwell - Confidential      2 Q. Other than assuming you may have      3 said hello, did you have any conversations      4 with her?      5 A. Not that I recall.      6 Q. Did [REDACTED] complain to you or      7 Mr. Epstein about anything?      8 MR. PAGLIUCA: Objection to form      9 and foundation.      10 A. I don't know what she would have      11 done if she complained to Jeffrey about      12 anything, but she didn't complain to me, as      13 far as I recall.      14 Q. As far as you know, she didn't      15 complain to Mr. Epstein, is that correct?      16 A. I have no knowledge of what she did      17 or didn't do in that regard.      18 Q. Did she call the police or threaten      19 to call the police because of anything that      20 either you or Mr. Epstein did?      21 MR. PAGLIUCA: Objection to form      22 and foundation.      23 A. I never ever heard that.      24 Q. [REDACTED] didn't tell you, is your      25 testimony?</p>	<p>1 G. Maxwell - Confidential      2 ever see [REDACTED]      3 A. I don't recall ever seeing her.      4 Q. [REDACTED]      5 [REDACTED]      6 A. [REDACTED]      7 Q. Did [REDACTED] ever engage in any      8 sexual activity with Mr. Epstein?      9 A. I wouldn't know. I would assume      10 not, but I don't know.      11 Q. Do you have any reason to believe      12 that Mr. Epstein engaged in any sexual      13 activity with [REDACTED]      14 MR. PAGLIUCA: Objection to form      15 and foundation.      16 A. I wouldn't know.      17 Q. Did you ever give a massage to      18 anyone other than Mr. Epstein at any of Mr.      19 Epstein's properties?      20 A. First of all, I never said I gave      21 Mr. Epstein a massage.      22 Q. I will ask that question if you      23 want, but I was focusing on people other than      24 Mr. Epstein right now.      25 A. I don't give massages.</p>
Page 111	Page 113
<p>1 G. Maxwell - Confidential      2 MR. PAGLIUCA: Objection to form      3 and foundation.      4 A. My testimony is I never heard that,      5 period.      6 Q. That includes, I assume, that you      7 never heard that from [REDACTED] that's your      8 testimony?      9 MR. PAGLIUCA: Objection to form      10 and foundation.      11 A. I think you can safely say if      12 you've never heard it at all, it would      13 encompass anybody at all. It means you never      14 heard it, period.      15 Q. Did you ever see [REDACTED] in      16 Ohio?      17 A. Not that I recall.      18 Q. Where did you last see [REDACTED]      19 [REDACTED]      20 A. I only recall seeing her at the      21 ranch.      22 Q. In New Mexico?      23 A. Yeah.      24 Q. Other than seeing [REDACTED] at      25 Mr. Epstein's place in New Mexico, did you</p>	<p>1 G. Maxwell - Confidential      2 Q. Let's just tie that down. It is      3 your testimony that you've never given      4 anybody a massage?      5 A. I have not given anyone a massage.      6 Q. You never gave Mr. Epstein a      7 massage, is that your testimony?      8 A. That is my testimony.      9 Q. You never gave [REDACTED] a      10 massage is your testimony?      11 A. I never gave [REDACTED] a      12 massage.      13 Q. Did you, or to your knowledge,      14 Mr. Epstein pay for [REDACTED] to go to      15 Thailand?      16 MR. PAGLIUCA: Objection to form      17 and foundation.      18 A. I am not aware.      19 Q. Do you know whether [REDACTED]      20 went to Thailand?      21 A. I have no knowledge of anything      22 like that.      23 Q. Did you ever give anyone      24 instructions as to how to give a massage?      25 MR. PAGLIUCA: Objection to form</p>

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<p style="text-align: right;">Page 114</p> <p>1        G. Maxwell - Confidential 2        and foundation. 3        A. No. With a clarification, I do -- 4        I have very -- how to massage feet, pressure 5        points on a foot and pressure points on a 6        hand. 7        Q. Is what you're saying is that you 8        gave people instructions as to how to massage 9        feet and hands? 10      A. I have never given any 11      instructions. I have shown where pressure 12      points are on a hand and on a foot, but I 13      have never given instructions on how to do 14      it. I have demonstrated where a pressure 15      point on a hand and a foot is. 16      Q. Did you do that demonstration with 17      people who were giving or were planning to 18      give Mr. Epstein massages? 19      MR. PAGLIUCA: Objection to form 20      and foundation. 21      A. No, just in general, something 22      that I know how to do, so it would be just as 23      a general thing I have done. 24      Q. When you talk about general thing 25      you have done, is to tell people where the</p>	<p style="text-align: right;">Page 116</p> <p>1        G. Maxwell - Confidential 2        people how to give massage. Did you do that? 3        A. I have not done that. 4        Q. Did you ever tell or show people 5        how to give Mr. Epstein a massage? 6        A. No. 7        Q. Did you ever tell or show people at 8        Mr. Epstein's properties how to give 9        massages? 10      A. No. 11      Q. Did you at any time, at any of 12      Mr. Epstein's properties, tell or show anyone 13      how to give massages or how Mr. Epstein liked 14      massages? 15      MR. PAGLIUCA: Objection to form 16      and foundation. 17      A. No. I think Mr. Epstein is 18      perfectly capable -- 19      MR. PAGLIUCA: There is no question 20      pending. 21      Q. Did Mr. Epstein, in your presence, 22      ever tell or show anyone how he liked 23      massages? 24      A. I don't recall. 25      Q. Did Mr. Epstein ever tell you how</p>
<p style="text-align: right;">Page 115</p> <p>1        G. Maxwell - Confidential 2        pressure points are on hands and feet? 3        A. Yes. 4        Q. Did you ever use that knowledge to 5        try to show someone who was giving or was 6        planning to give Mr. Epstein a massage how to 7        do it? 8        MR. PAGLIUCA: Objection to form 9        and foundation. Asked and answered. 10      A. I am not aware of ever having done 11      that, but I am aware of having shown people 12      that there is a pressure point on the hand 13      and foot. I have no specific knowledge of 14      who. Just in general, I have done it. 15      Q. Did you show people pressure points 16      on hands and feet in Mr. Epstein's house in 17      Palm Beach? 18      A. I don't recall with specificity 19      where. I just know I do it because it's just 20      something that I happen to know, it helps 21      people, something I know. 22      Q. What I'm trying to be sure that I 23      have your testimony on is whether at any of 24      Mr. Epstein's properties, whether you call it 25      instructions or not, told people or showed</p>	<p style="text-align: right;">Page 117</p> <p>1        G. Maxwell - Confidential 2        he liked or didn't like massages given by any 3        particular person? 4        A. I can't recall. 5        Q. In other words, did he ever praise 6        to you or compliment to you some massage that 7        he had gotten or some person who had given 8        him a massage? 9        A. I'm sure in the course of time he 10      did, but I can't recall. 11      Q. Did he ever complain to you or 12      criticize the massage that anyone gave him? 13      A. Again, I don't recall. 14      Q. You know [REDACTED] 15      [REDACTED], correct? 16      A. I do. 17      Q. Did Mr. Epstein, insofar as you 18      have any reason to believe, ever engage in 19      sexual activities with her? 20      A. I have no knowledge. 21      Q. Did you ever engage in sexual 22      activities with [REDACTED] 23      A. No. 24      Q. Have you had any conversations with 25      [REDACTED] about Mr. Epstein's</p>

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1 G. Maxwell - Confidential  
 2 massages or sexual activities?  
 3 MR. PAGLIUCA: Objection to form  
 4 and foundation.  
 5 A. No.  
 6 Q. When was the last time you had any  
 7 communications with [REDACTED]  
 8 A. A long time ago. So long, I don't  
 9 recall.  
 10 Q. Were you aware that [REDACTED]  
 11 [REDACTED] was noticed for a deposition in this  
 12 case?  
 13 A. I believe I did know that, yes.  
 14 Q. Did you have any conversations with  
 15 anyone as to whether or not [REDACTED]  
 16 [REDACTED] would or should show up for that  
 17 deposition?  
 18 MR. PAGLIUCA: Wait a minute, what  
 19 does that have to do with the court's  
 20 order. Don't answer that question.  
 21 Just don't answer it. This is silly.  
 22 MR. BOIES: I actually think it is  
 23 far from silly. I think it goes to an  
 24 obstruction of justice situation that I  
 25 think you would be well advised to allow

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1 G. Maxwell - Confidential  
 2 your client to answer the question on.  
 3 MR. PAGLIUCA: Do you have a good  
 4 faith basis to suggest that she  
 5 suggested that [REDACTED] not show up at  
 6 her deposition yesterday?  
 7 MR. BOIES: I don't know whether it  
 8 was you, I don't know whether it was  
 9 her, I don't know who did it. What I do  
 10 know is that she didn't show up, and I  
 11 think the evidence will be quite clear  
 12 that your client's testimony about the  
 13 extent of her relationship with [REDACTED]  
 14 [REDACTED] is not accurate.  
 15 And in that context, I think the  
 16 circumstances under which it turns out  
 17 that she doesn't show up is entirely  
 18 appropriate for examination, but that is  
 19 something that I'm happy to talk to the  
 20 judge about.  
 21 MR. PAGLIUCA: Sure. And I hope  
 22 that you give him some good faith basis  
 23 for the assertions that you are making  
 24 here today, which are wholly improper.  
 25 MR. BOIES: I don't think they are

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1 G. Maxwell - Confidential  
 2 at all improper. I am not making any  
 3 assertions. I'm simply asking  
 4 questions. I'm trying to find out what  
 5 the facts are.  
 6 MR. PAGLIUCA: No, you are not.  
 7 MR. BOIES: Yes, I am. You are  
 8 trying to keep the facts from coming  
 9 out.  
 10 MR. PAGLIUCA: No, I'm not. I'm  
 11 trying to keep this orderly and not  
 12 abusive as to where it is going.  
 13 MR. BOIES: This is so far from  
 14 abusive.  
 15 MR. PAGLIUCA: I think we should  
 16 take a lunch break, given it is noon.  
 17 MR. BOIES: We will do it in a half  
 18 hour, I want to finish this line of  
 19 questioning. I will guarantee we are  
 20 out by 12:30.  
 21 BY MR. BOIES:  
 22 Q. Let me ask you about a few other  
 23 people. [REDACTED], do you know her?  
 24 A. I do.

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1 G. Maxwell - Confidential  
 2 Q. Is she anyone with whom Mr. Epstein  
 3 had sex?  
 4 MR. PAGLIUCA: Objection to form  
 5 and foundation.  
 6 A. I have no idea.  
 7 Q. Is she anyone with whom Mr. Epstein  
 8 engaged in sexual activities?  
 9 MR. PAGLIUCA: Objection to form  
 10 and foundation.  
 11 A. I have no personal knowledge.  
 12 Q. When you say you have no personal  
 13 knowledge, what do you mean by personal  
 14 knowledge?  
 15 A. I mean that I've read the police  
 16 reports, so that's the only knowledge I have  
 17 of what [REDACTED] or anybody else has with  
 18 Jeffrey. I have no way of knowing whether  
 19 they did or not. Personal knowledge means  
 20 did I know myself.  
 21 Q. After you saw the police reports  
 22 about Mr. Epstein's relations with [REDACTED]  
 23 [REDACTED], did you ever talk to Mr. Epstein  
 24 about whether or not that police report was  
 25 or was not accurate?

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1 G. Maxwell - Confidential 2 A. I have not. 3 Q. You did communicate with 4 Mr. Epstein after you saw that police report, 5 correct? 6 MR. PAGLIUCA: Objection to form 7 and foundation. 8 A. I don't know that's true. 9 Q. When did you see the police report? 10 MR. PAGLIUCA: If this involves 11 communications with me, I'm going to 12 instruct you not to answer the 13 questions. 14 Q. Is it your testimony that the only 15 time you saw the police reports was when it 16 was shown to you by your counsel? 17 A. That's the only time I recollect. 18 Q. What? 19 A. That's the only time I remember 20 seeing it. 21 Q. When did your counsel show you the 22 police report? 23 MR. PAGLIUCA: If you remember, you 24 can answer that question. 25 A. I don't know. I guess recently,	Page 122	Page 124 1 G. Maxwell - Confidential 2 A. A very long time ago. 3 Q. How long? 4 A. I think two years ago, something 5 like that. 6 Q. Before this defamation lawsuit? 7 A. Excuse me? 8 Q. Before this defamation lawsuit? 9 A. You are asking if I communicated 10 with him before the defamation? What are you 11 asking me? 12 Q. Have you communicated with 13 Mr. Epstein since this defamation lawsuit was 14 filed? 15 A. I don't believe I have. I haven't 16 spoken to him -- no, I don't think so. I 17 don't remember when it was filed, no, I don't 18 think so. 19 Q. By communication, I don't mean just 20 speaking to him. I mean writing him a 21 letter, email, communicated in any way? 22 A. No. 23 Q. When you say no, does that mean you 24 have not communicated with Mr. Epstein in any 25 way since this lawsuit was filed?
1 G. Maxwell - Confidential 2 but I don't recall. 3 Q. In the last 30 days? 4 A. I really don't remember when I saw 5 it. 6 Q. Was the first time that you saw the 7 police report sometime this calendar year 8 2016? 9 A. I don't remember when I've seen 10 them. It's in the course of this latest 11 lies. 12 Q. What do you mean, in the course of 13 this latest lies? 14 A. In the course of this defamation 15 suit. 16 Q. And you may not be able to answer 17 this, but if you can, I just want to know. 18 When you saw the police report in the course 19 of this defamation suit, was it this calendar 20 year, that is 2016, sometime? 21 A. I don't know, I'm sorry, I have no 22 memory. 23 Q. When is the last time you had a 24 conversation or communication with 25 Mr. Epstein?	Page 123	Page 125 1 G. Maxwell - Confidential 2 A. I don't recall any communications 3 with him since this lawsuit has been filed. 4 Q. Did you ever discuss [REDACTED] 5 [REDACTED] with Mr. Epstein? 6 MR. PAGLIUCA: Objection to form 7 and foundation. 8 A. I would have had conversations with 9 him in general terms. Obviously I talked 10 about her with him but not in any context of 11 this situation. Just I will have talked to 12 him about her. 13 Q. When was the last time you talked 14 to Mr. Epstein about [REDACTED] 15 A. Probably in 2003, 2002. 16 Q. What was the subject matter of that 17 conversation? 18 A. I have no idea. 19 Q. Did it have anything to do with 20 Mr. Epstein's relationship with [REDACTED] 21 [REDACTED] 22 A. No, I have no idea. It would have 23 nothing to do with anything other than a 24 work-related issue. 25 Q. Did [REDACTED] work for

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<p style="text-align: right;">Page 126</p> <p>1 G. Maxwell - Confidential      2 Mr. Epstein?      3 A. I believe she did.      4 Q. Was she working for Mr. Epstein in      5 2003?      6 A. I believe she was.      7 Q. What was her job?      8 A. I don't exactly know what her job,      9 her responsibilities were.      10 Q. Do you know any of job      11 responsibilities?      12 A. I believe she traveled with him and      13 help managed the houses and run the staff and      14 whatever else he asked her to do. She worked      15 for Mr. Epstein, so you would have to ask      16 him.      17 Q. Was it your understanding that      18 [REDACTED] at some point had had a      19 sexual or romantic relationship with      20 Mr. Epstein?      21 A. I have no knowledge of that.      22 Q. Let me go back to [REDACTED].      23 Did you know, yourself, [REDACTED].      24 A. I met her.      25 Q. Where did you meet her?</p>	<p style="text-align: right;">Page 128</p> <p>1 G. Maxwell - Confidential      2 started, did you have any reason to believe      3 that Mr. Epstein had engaged in sexual      4 activities with [REDACTED]      5 MR. PAGLIUCA: Objection to form      6 and foundation.      7 A. I don't -- I have no idea. It      8 wouldn't be something I think about.      9 Q. I'm sorry, say that again?      10 A. I would have no idea.      11 Q. Did [REDACTED], insofar as      12 you were aware, ever give Mr. Epstein a      13 massage?      14 A. I have no idea.      15 Q. Did you ever see her go into the      16 massage room?      17 A. Not that I recall, no.      18 Q. Did you ever tell [REDACTED]      19 that Mr. Epstein wanted her in the massage      20 room?      21 A. No.      22 Q. Did you ever have any discussions      23 with Mr. Epstein about [REDACTED]      24 A. None.      25 Q. Did you ever have any discussions</p>
<p style="text-align: right;">Page 127</p> <p>1 G. Maxwell - Confidential      2 A. I don't recall where I met her, I      3 just don't.      4 Q. Did you meet her at one of      5 Mr. Epstein's properties?      6 A. It's possible, but I don't recall      7 where I met her.      8 Q. Did you ever see [REDACTED] at any of      9 Mr. Epstein's properties?      10 A. I believe that -- I believe on the      11 island, I recall, maybe.      12 Q. Virgin Islands?      13 A. Virgin Islands.      14 Q. Did [REDACTED] work for Mr. Epstein?      15 A. I don't know.      16 Q. Did [REDACTED] travel with Mr. Epstein?      17 A. I don't know. If she was on the      18 island, then presumably she did. I don't      19 recall.      20 Q. Did you ever see [REDACTED]      21 at any of Mr. Epstein's properties other than      22 in the Virgin Islands?      23 A. Not that I recall.      24 Q. Leaving aside anything that you      25 have learned since this defamation suit</p>	<p style="text-align: right;">Page 129</p> <p>1 G. Maxwell - Confidential      2 with [REDACTED] about Mr. Epstein?      3 A. None.      4 Q. Do you know how much money, if any,      5 Mr. Epstein paid [REDACTED]      6 A. I have no idea, no, I have no idea.      7 Q. Do you know whether Mr. Epstein      8 paid [REDACTED], even if you don't know      9 the amount?      10 A. No, I would not know that.      11 Actually, I don't, I don't recall any      12 conversation --      13 MR. PAGLIUCA: There is no question      14 pending.      15 Q. Do you know who [REDACTED]      16 is?      17 A. Yes.      18 Q. Would you identify him for the      19 record?      20 A. [REDACTED]</p>

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<p style="text-align: right;">Page 130</p> <p>1 G. Maxwell - Confidential      2 in Palm Beach in the 1990s and 2000s?      3 A. I don't believe so.      4 Q. [REDACTED] for      5 Mr. Epstein?      6 A. I believe late -- middle of 2000s.      7 2004, 2005, something like that.      8 Q. When he became [REDACTED]      9 [REDACTED], did he work for Mr. Epstein in      10 Palm Beach?      11 A. I believe he did.      12 Q. And did you see [REDACTED] at      13 Mr. Epstein's Palm Beach residence while [REDACTED]      14 [REDACTED]      15 A. I was not in Palm Beach when he was      16 working for Mr. Epstein.      17 Q. I think you answered the question,      18 but I want to be absolutely certain. Is it      19 your testimony that you never saw      20 [REDACTED] at Mr. Epstein's Palm Beach      21 residence?      22 A. That is not my testimony.      23 Q. Did you ever see [REDACTED] at      24 Mr. Epstein's Palm Beach residence?</p>	<p style="text-align: right;">Page 132</p> <p>1 G. Maxwell - Confidential      2 Q. Did you see [REDACTED] at Mr.      3 Epstein's Palm Beach residence in 2005?      4 A. I don't recall going to the house      5 in 2005, but if I was there and he was      6 working, I would have seen him.      7 Q. Do you recall, as you sit here now,      8 one way or another, whether you were at Mr.      9 Epstein's Palm Beach residence in 2005?      10 A. I don't recall going to the house      11 in 2005, but if I did go, I would have seen      12 him. And if I did go, it would have been      13 once, maybe, I maybe went to the house in      14 2005, I don't recall.      15 Q. If you went to the house in 2005,      16 is it your testimony it would have only been      17 once?      18 A. Sounds about right, maybe twice. I      19 was not in Palm Beach in 2005.      20 Q. For you to have been at Mr.      21 Epstein's house in Palm Beach, you would have      22 had to have been in Palm Beach, right?      23 A. I would have had to have been in      24 Palm Beach to be at his house in Palm Beach,      25 of course.</p>
<p style="text-align: right;">Page 131</p> <p>1 G. Maxwell - Confidential      2 A. I'm sure I did because I would have      3 seen him. I'm sure I did see him but -- yes,      4 I would have seen him.      5 Q. When did you see [REDACTED] at      6 Mr. Epstein's Palm Beach residence?      7 A. If I'm right and I could -- the      8 dates are a bit off, Mr. Epstein's mother      9 died, I think [REDACTED] was working for      10 Mr. Epstein at that time, and I helped with      11 the funeral arrangements and I would have      12 seen him at that point.      13 Q. Other than the one occasion when      14 Mr. Epstein's mother died, we can figure out      15 what the date of that was --      16 A. I don't have all the dates in my      17 head.      18 Q. Other than the one occasion when      19 Mr. Epstein's mother died, did you ever see      20 [REDACTED]      21 A. In that period of time when I went      22 very infrequently to Palm Beach, I don't know      23 how many times, maybe once or twice and had      24 he been at the house, I would have seen him,      25 so there would have been very few times.</p>	<p style="text-align: right;">Page 133</p> <p>1 G. Maxwell - Confidential      2 Q. So when you say you were not in      3 Palm Beach in 2005, does that mean it is your      4 testimony you were not at Mr. Epstein's house      5 in Palm Beach in 2005?      6 A. I don't recall being at Mr.      7 Epstein's house in 2005, I don't really      8 recall being in Palm Beach in 2005, and if I      9 was in Palm Beach in 2005, I may not have      10 stayed at his house.      11 Q. Is it your testimony that the most      12 you would have been at Mr. Epstein's house in      13 Palm Beach in 2005 was once or twice, if      14 that?      15 A. To the best of my recollection,      16 that sounds about right. But I really don't      17 recall, 2005 is a long time ago, I just don't      18 recall.      19 Q. You were continuing to work for      20 Mr. Epstein in 2005?      21 A. I was helping out in just very      22 specific areas of staffing of the houses and      23 some architectural details and decorating.      24 Q. You were getting paid?      25 MR. PAGLIUCA: We've gone over</p>

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<p style="text-align: right;">Page 134</p> <p>1      G. Maxwell - Confidential      2      this. You don't need to testify about      3      this again. We will take it up with the      4      judge, if we need to. I let this go on      5      for 15 minutes about Palm Beach.</p> <p>6      MR. BOIES: I ask the question, you      7      give the instruction, the judge decides.</p> <p>8      Q. In 2005, were you assisting in the      9      arranging of massages for Mr. Epstein?</p> <p>10     A. No.</p> <p>11     Q. Not at all is your testimony?</p> <p>12     A. Correct.</p> <p>13     MR. BOIES: This is a good time to      14     take a lunch break.</p> <p>15     MR. PAGLIUCA: Okay. I don't      16     intend on being here all day, so if you      17     have some important questions you want      18     to ask, you may want to get to those.</p> <p>19     MR. BOIES: You can walk out any      20     time you want.</p> <p>21     MR. PAGLIUCA: We are getting      22     close.</p> <p>23     MR. BOIES: The judge will decide      24     whether that's appropriate or not.</p> <p>25     MR. PAGLIUCA: We are getting</p>	<p style="text-align: right;">Page 136</p> <p>1      G. Maxwell - Confidential      2      A F T E R N O O N   S E S S I O N      3      (Time noted: 1:16 p.m.)</p> <p>4</p> <p>5      G H I S L A I N E   M A X W E L L ,      6      resumed and testified as follows:</p> <p>7</p> <p>8      THE VIDEOGRAPHER: The time is 1:16      9      p.m., and we are back on the record.</p> <p>10     This also begins DVD No. 5.</p> <p>11     MR. PAGLIUCA: One housekeeping      12     matter before you get started. The      13     original deposition was as confidential      14     and we would designate this continued      15     deposition as confidential as well.</p> <p>16     MR. BOIES: Okay.</p> <p>17     Let me ask you to look at a      18     document that has been marked as Maxwell      19     Deposition Exhibit 28. This is another      20     list of names.</p> <p>21     (Maxwell Exhibit 28, List of names,      22     marked for identification, as of this      23     date.)</p> <p>24     Q. What I would ask you to do is to      25     identify the names that are here that you do</p>
<p style="text-align: right;">Page 135</p> <p>1      G. Maxwell - Confidential      2      close.</p> <p>3      THE VIDEOGRAPHER: It's 12:15 p.m.      4      and we are going off the record.</p> <p>5      (Whereupon, a luncheon recess was      6      taken at 12:15 p.m.)</p> <p>7</p> <p>8      * * *</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 137</p> <p>1      G. Maxwell - Confidential      2      not recognize. That is, I think you will      3      recognize most of the names --</p> <p>4      MR. POTTINGER: Excuse me one      5      second.</p> <p>6      Q. What I was saying was that I would      7      like you to look at the names here and tell      8      me which names you do not recognize.</p> <p>9      A. I pretty much recognize these      10     names. I don't know everybody very well, but      11     I recognize the names.</p> <p>12     Q. You know who they are?</p> <p>13     A. I don't know if I know who they      14     are. I recognize the names.</p> <p>15     Q. Are most of the people on this list      16     people that you've met before?</p> <p>17     MR. PAGLIUCA: Objection to form      18     and foundation.</p> <p>19     A. I believe I've met pretty much      20     everybody on this list.</p> <p>21     Q. Who on the list have you not met?</p> <p>22     A. I think I met them all.</p> <p>23     Q. Now, were all of these people      24     people that at one time or another you were      25     with with Mr. Epstein?</p>

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1	G. Maxwell - Confidential	G. Maxwell - Confidential
2	MR. PAGLIUCA: Objection to form	and foundation.
3	and foundation.	A. [REDACTED] was his girlfriend.
4	A. I believe so.	Q. I am sorry?
5	Q. Were any of these people on the	A. [REDACTED] was his girlfriend.
6	list, obviously leaving aside Mr. Epstein	Q. When was [REDACTED] Mr. Epstein's
7	himself, people who, to your knowledge,	girlfriend?
8	received massages at one or more of Mr.	A. I don't know the dates, but I
9	Epstein's properties?	believe in the '80s.
10	MR. PAGLIUCA: Objection to form	Q. In the 1980s?
11	and foundation.	A. Yeah, and part of the 1990s, I
12	A. I couldn't say.	believe. So I don't know when they started
13	Q. Are there any people on this list	and when they ended. They were in a
14	who you have reason to believe received	long-term relationship.
15	massages at one or more of Mr. Epstein's	Q. Was Mr. Epstein engaged in sexual
16	properties?	activities with [REDACTED] during the
17	MR. PAGLIUCA: Objection to form	period of time that you were involved with
18	and foundation.	Mr. Epstein?
19	A. I couldn't say.	A. I wouldn't know.
20	Q. Just to be clear, my most recent	Q. How old was [REDACTED] when she
21	question is whether any of the people on this	was first involved with Mr. Epstein?
22	list are people who you have reason to	A. I don't know.
23	believe received massages at one of Mr.	Q. How old was [REDACTED] when you
24	Epstein's properties?	first met her?
25	MR. PAGLIUCA: Same objection.	A. I don't recall.
	Page 139	Page 141
1	G. Maxwell - Confidential	G. Maxwell - Confidential
2	A. I couldn't say.	Q. Did any of the people on this list,
3	Q. Why can't you say?	other than Mr. Epstein himself, and the list
4	A. Because I just don't know.	is Exhibit 28, ever ask you to arrange a
5	Q. Well, you know whether you have a	massage?
6	reason to believe, correct?	MR. PAGLIUCA: Objection to form
7	MR. PAGLIUCA: Objection to form	and foundation.
8	and foundation.	A. Not that I recall.
9	A. These are events that took place 17	Q. Did you arrange a massage for any
10	years ago, and I really do not know. It is	of the people on this list other than
11	possible that people on that list got a	Mr. Epstein?
12	massage, it's also possible they didn't. I	A. Not that I recall.
13	really don't know, leaving aside, of course,	Q. Were any of the people on this
14	Mr. Epstein himself.	list, other than Mr. Epstein, given a massage
15	Q. Yes.	at any of Mr. Epstein's residences?
16	MR. PAGLIUCA: One second, I'm	MR. PAGLIUCA: Objection to form
17	getting text messages.	and foundation. Asked and answered.
18	[REDACTED]	A. I wouldn't know.
22	Q. Are there any names on this list	Q. Did any of the people on this list,
23	that you have reason to believe Mr. Epstein	other than Mr. Epstein, engage in sexual
24	engaged in sexual activities with?	activities with anyone at Mr. Epstein's
25	MR. PAGLIUCA: Objection to form	properties?
		MR. PAGLIUCA: Objection to form
		and foundation.
		A. I wouldn't know.

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1 G. Maxwell - Confidential  
 2 Q. When you say I wouldn't know, I  
 3 take it you mean to include that you  
 4 testified that you do not know, is that  
 5 correct?

6 MR. PAGLIUCA: Objection to form  
 7 and foundation.

8 A. I would have no knowledge. I have  
 9 no knowledge of what you are asking me.

10 Q. Did you ever have conversations  
 11 with anyone that were intended to convince  
 12 them to engage in sexual activities with  
 13 Mr. Epstein?

14 MR. PAGLIUCA: Objection to form  
 15 and foundation. This has been asked and  
 16 answered in her previous deposition, by  
 17 the way.

18 A. No.

19 Q. Did you ever tell anyone that  
 20 Mr. Epstein was a scout for Victoria's  
 21 Secret?

22 A. I don't recall saying that.

23 Q. Did you ever tell anyone that  
 24 Mr. Epstein could get them a job with  
 25 Victoria's Secret?

1 G. Maxwell - Confidential  
 2 [REDACTED]

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1 G. Maxwell - Confidential  
 2 A. I don't recall saying that.

3 Q. Do you deny saying that, or do you  
 4 simply say you don't recall, one way or  
 5 another, whether you said it?

6 MR. PAGLIUCA: This is outside the  
 7 court's order, so I will tell you not to  
 8 answer this, and we will take it up with  
 9 the judge.

1 G. Maxwell - Confidential  
 2 [REDACTED]

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1 G. Maxwell - Confidential  
2 [REDACTED]

1 G. Maxwell - Confidential  
2 [REDACTED]

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1 G. Maxwell - Confidential  
2 [REDACTED]

1 G. Maxwell - Confidential  
2 [REDACTED]

15 Q. Was there anything that occurred  
16 that led you to conclude that you didn't want  
17 to be there anymore?

18 A. I ceased to be happy in the job and  
19 I ceased to be happy spending time with  
20 Mr. Epstein.

21 Q. Was there anything that happened  
22 that you can identify that caused you to  
23 cease to be happy spending time with  
24 Mr. Epstein?

25 A. He became more difficult to work

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1 G. Maxwell - Confidential  
2 with.3 Q. Was there any particular aspect of  
4 that that you can identify now?

5 A. Just general. Just doesn't work.

6 Q. Let me focus on [REDACTED]. Now,  
7 you testified that you have no reason to  
8 believe that [REDACTED] engaged in sexual  
9 activities with anyone at any of Mr.  
10 Epstein's residences, is that correct?

11 A. I would have no knowledge of that.

12 Q. Did you ever see [REDACTED] engage  
13 in sexual activities with anyone?

14 A. I did not.

15 Q. Did you ever see [REDACTED] taking  
16 photographs of people engaged in sexual  
17 activities?

18 A. I did not.

19 Q. I apologize for getting into  
20 something that is kind of an intimate area,  
21 but I need to establish this, in part because  
22 it relates to patterns of conduct, and I need  
23 to ask you some questions about your sexual  
24 activities with Mr. Epstein.

25 A. Okay.

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1 G. Maxwell - Confidential  
2 [REDACTED]  
3 [REDACTED]7 Q. Did you ever have conversations  
8 with anyone who was engaged in sexual  
9 activities with Mr. Epstein about those  
10 sexual activities?11 MR. PAGLIUCA: Objection to form  
12 and foundation.

13 A. I never had those conversations.

14 Q. So would it be your testimony that  
15 you never had any conversations about Mr.  
16 Epstein's sexual activities with [REDACTED]17 [REDACTED]  
18 A. I have never talked about sex with  
19 [REDACTED] at any point. I have hardly ever  
20 spoken to her.21 Q. Would your testimony be the same  
22 with respect to [REDACTED]23 A. That would be true, correct, I have  
24 not.

25 Q. And Virginia Roberts?

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1 G. Maxwell - Confidential  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]

1 G. Maxwell - Confidential

2 A. Of course not.

3 Q. Were there any young men that, to  
4 your knowledge, would bring women over to  
5 Mr. Epstein's residences to perform services  
6 for Mr. Epstein?7 MR. PAGLIUCA: Objection to form  
8 and foundation.9 A. Can you repeat the question,  
10 please?11 Q. Were there any young men that, to  
12 your knowledge, would bring women over to  
13 Mr. Epstein's residences to perform services  
14 for Mr. Epstein?15 A. I have no idea what you are talking  
16 about, I'm sorry.17 Q. I'm talking about whether there  
18 were any young men that brought women over to  
19 Mr. Epstein's residence to perform services?20 A. I can't think of a single man in  
21 that context that I've ever met.22 Q. You testified earlier that you did  
23 not recall ever meeting [REDACTED], is  
24 that correct?

25 A. I don't believe I ever have.

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<p style="text-align: right;">Page 154</p> <p>1        G. Maxwell - Confidential      2        Q. Insofar as you were aware, did      3        Virginia Roberts ever have a male friend that      4        visited her at the Epstein residences?      5        A. I don't recall ever seeing a man      6        with Virginia. I believe she had a fiance      7        that I was aware of, I think, but that's all.      8        Q. When were you aware that Virginia      9        Roberts had a fiance?      10      A. I can't say I became aware from      11     reading all this stuff, or I was aware of it      12     at the time. I don't know.      13      Q. Did you ever meet Virginia Roberts'      14     fiance?      15      A. I don't think I ever did. I don't      16     recall meeting any men with Virginia.      17      Q. Do you know [REDACTED],      18     [REDACTED]      19      A. I never heard that name before.      20      Q. Have you ever heard the name of      21     [REDACTED]      22      A. I don't recollect that name at all.      23      MR. PAGLIUCA: Mr. Boies, those      24     names are on Exhibit 26, which we have      25     already gone over and she said she</p>	<p style="text-align: right;">Page 156</p> <p>1        G. Maxwell - Confidential      2        what has been going on, and I      3        attribute -- maybe I shouldn't attribute      4        it at all.      5        But if you want to instruct not to      6        answer, instruct not to answer. If you      7        don't, again, all I will do is request      8        that you cease your comments. I can't      9        do that. All I can do is seek sanctions      10      afterwards.      11      BY MR. BOIES:      12      Q. Ms. Maxwell.      13      A. Mr. Boies.      14      Q. What?      15      A. I'm replying. You said Ms.      16      Maxwell, I said Mr. Boies.      17      Q. Do you have a question?      18      A. No.      19      Q. I have a question.      20      A. I'm sure you do.      21      Q. During the time that you were in      22     the property or at the property that      23     Mr. Epstein has in the Virgin Islands, were      24     you aware of Mr. Epstein getting any      25     massages?</p>
<p style="text-align: right;">Page 155</p> <p>1        G. Maxwell - Confidential      2        didn't recognize those people, so now we      3        are just repeating things that we went      4        over.      5        MR. BOIES: I am in the context of      6        seeing if I can refresh her      7        recollection, because these are women      8        that [REDACTED], who she also does not      9        recall, brought over to Mr. Epstein's      10      residences, and I also want to make a      11      very clear record of what her testimony      12      is and is not right now.      13      Again, you can instruct her not to      14      answer if you wish.      15      MR. PAGLIUCA: I'm trying to get to      16      nonrepetitive questions here. You      17      basically asked the same question three      18      times. Then we get a pile of notes that      19      get pushed up to you, you read those.      20      Then you ask those three times, and then      21      we go to another question. So it's      22      taking an inordinately long amount of      23      time and it shouldn't.      24      MR. BOIES: I think that is a      25      demonstrably inaccurate statement of</p>	<p style="text-align: right;">Page 157</p> <p>1        G. Maxwell - Confidential      2        A. He did receive massages at the      3        Virgin Islands property.      4        Q. From whom did he receive massages      5        at the Virgin Islands?      6        A. There is a professional masseuse      7        and masseur that came from St. Thomas.      8        Q. This was somebody who came over      9        from St. Thomas for the day to give massages      10      and then left, or was that person a resident?      11      A. I believe, from memory, they came      12      over, gave a massage and left.      13      Q. And who arranged for this person to      14      come over from St. Thomas?      15      A. Probably the staff at the island.      16      Q. But you don't know?      17      A. The staff of the island would have      18      made those arrangements.      19      Q. Who at the staff?      20      A. Whoever would have been running the      21      island at that period of time.      22      Q. Do you know who that was?      23      A. I'm sorry, in this moment I can't      24      think of the names of the people who worked      25      on the island.</p>

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<p style="text-align: right;">Page 158</p> <p>1        G. Maxwell - Confidential      2        Q. Did you ever arrange for anyone to      3        give Mr. Epstein a massage at his Virgin      4        Island property?      5        A. I don't recall if I ever made a      6        call to the massage people in St. Thomas. I      7        don't recall.      8        Q. Did Mr. Epstein ever receive      9        massages at his Virgin Island property from      10      people that he had brought with him on his      11      plane from the United States?      12      MR. PAGLIUCA: Objection to form      13      and foundation.      14      A. I don't know.      15      Q. Did you ever participate in      16      arranging for a massage for Mr. Epstein by      17      someone who had been brought to the island on      18      Mr. Epstein's plane?      19      A. My memory of the massages on the      20      island were from people who came from St.      21      Thomas.      22      Q. Does that mean that you never      23      participated in arranging for a massage for      24      Mr. Epstein at his Virgin Island property to      25      be given by someone who had been brought to</p>	<p style="text-align: right;">Page 160</p> <p>1        G. Maxwell - Confidential      2        A. It was a cabana, and also he had a      3        beach place, a place on the beach where from      4        time to time he would...      5        Q. Did you ever see Mr. Epstein being      6        given a massage in the beach area where he      7        from time to time had massages?      8        A. I don't have any recollection of a      9        specific memory, but it was just on the      10      beach, so there wouldn't be any privacy, he      11      would just be getting a massage.      12      Q. That would be visible to people who      13      are on the beach, correct?      14      A. It would be, yes.      15      Q. Did you, at any time when you were      16      there, see Mr. Epstein being given a massage      17      in this beach area other than by a      18      professional masseuse brought to the island      19      from St. Thomas?      20      A. I don't have any memory of -- I      21      don't have a specific memory of seeing him      22      get a massage on the beach. I just have an      23      image of a massage on the beach, so I don't      24      know who, I have no memory of it.      25      Q. Whether or not you have a specific</p>
<p style="text-align: right;">Page 159</p> <p>1        G. Maxwell - Confidential      2        the island on Mr. Epstein's plane?      3        MR. PAGLIUCA: Objection to form      4        and foundation.      5        A. I don't recall, I have no idea.      6        Q. Mr. Epstein did bring women to his      7        Virgin Island property on his plane from time      8        to time, right?      9        MR. PAGLIUCA: Objection to form      10      and foundation.      11      A. People came to the island who were      12      his guests.      13      Q. And some of those guests, as you      14      described it, were women, right?      15      A. Indeed.      16      Q. Did you ever participate in      17      arranging for any of the women that came to      18      Mr. Epstein's Virgin Island property to      19      provide Mr. Epstein with a massage?      20      A. No.      21      Q. Where on the Virgin Island property      22      did Mr. Epstein have his massages?      23      A. I believe from memory he had them      24      in the master cabana.      25      Q. In what?</p>	<p style="text-align: right;">Page 161</p> <p>1        G. Maxwell - Confidential      2        memory of it, do you have a general memory      3        that from time to time Mr. Epstein got      4        massages down in the beach area?      5        A. I have a general memory, I do.      6        Q. Do you have a general memory that      7        from time to time those massages were given      8        to Mr. Epstein by people other than a      9        professional masseuse brought to the island      10      from St. Thomas?      11      MR. PAGLIUCA: Objection to form      12      and foundation.      13      A. I have no idea who would be giving      14      him a massage in that general memory of mine,      15      so I can't say. The massages that I recall      16      were from people from St. Thomas, and that's      17      what I recall.      18      Q. Did anyone ever complain to you      19      that Mr. Epstein had demanded sex of them?      20      MR. PAGLIUCA: Objection to form      21      and foundation.      22      A. Is that a question?      23      Q. Yes.      24      A. Never.      25      Q. Do you know somebody named [REDACTED]</p>

Confidential

<p>1 G. Maxwell - Confidential 2 [REDACTED] 3 A. I do not. 4 Q. Who is he? 5 A. I don't know him -- I know who he 6 is now, but he worked, I believe, for [REDACTED] 7 [REDACTED], but prior to -- 8 Q. [REDACTED] 9 A. Yeah. 10 Q. It's your testimony you never met 11 [REDACTED] 12 A. I don't recall ever meeting him. 13 Q. Do you remember being a [REDACTED] 14 [REDACTED] 15 A. I do not. 16 Q. Do you ever remember a [REDACTED] 17 during 18 the period of time that you were with 19 Mr. Epstein? 20 A. I do not. 21 Q. Was there ever a time when you were 22 at [REDACTED] with a girl under the 23 age of 21 who had been with Mr. Epstein? 24 MR. PAGLIUCA: Objection to form</p>	<p>Page 162</p> <p>1 G. Maxwell - Confidential 2 MR. PAGLIUCA: Objection to form 3 and foundation. 4 A. No, no. 5 Q. Let me see if I can possibly 6 refresh your recollection. Do you recall 7 being at the [REDACTED] 8 [REDACTED] that was crying and very 9 distraught? 10 A. I have never seen that. 11 Q. Did you ever take the passport of 12 any person who had told you that Mr. Epstein 13 had demanded sex of them? 14 A. No. 15 Q. Were you ever at any residence of 16 Mr. Epstein's when Alan Dershowitz was 17 present? 18 A. I'm sure I was. 19 Q. Were you at Mr. Epstein's Palm 20 Beach residence when Mr. Dershowitz was 21 present? 22 A. I may have been. It's possible. 23 Q. Were you at Mr. Epstein's New 24 Mexico property when Mr. Dershowitz was 25 present?</p>
<p>1 G. Maxwell - Confidential 2 and foundation. 3 A. Can you repeat the question, 4 please? 5 Q. Sure. 6 You remember from time to time 7 being at [REDACTED], correct? 8 A. I do. 9 Q. And I think you testified that you 10 don't remember whether [REDACTED] was present 11 on any of those occasions, although he might 12 have been, correct? 13 A. If [REDACTED] was standing right 14 here in front of me, I wouldn't know who he 15 is. 16 Q. Does that mean you are saying that 17 you never met him or simply that you don't 18 remember him? 19 A. I don't know if I ever met him, but 20 if I saw him in a picture, maybe I would 21 recognize it, but I don't believe I'd 22 remember him. 23 Q. Did you ever go to the [REDACTED] 24 [REDACTED] with some woman who had previously 25 been with Mr. Epstein?</p>	<p>Page 163</p> <p>1 G. Maxwell - Confidential 2 A. I don't have any memory of that, 3 but it's possible. I just don't recall it. 4 Q. Were you at Mr. Epstein's Virgin 5 Islands property when Mr. Dershowitz was 6 present? 7 A. That I do recall, yes. 8 Q. Were you at Mr. Epstein's New York 9 property when Mr. Dershowitz was present? 10 A. Again, it's possible, but I don't 11 have a memory of it. 12 Q. How many times do you recall being 13 at Mr. Epstein's Virgin Island property when 14 Mr. Dershowitz was also present? 15 A. I only recall once. 16 Q. When was that? 17 A. I don't recall the date. 18 Q. Who else was present on that time? 19 A. I believe his wife and his 20 daughter. 21 Q. Anyone else? 22 A. I don't recall anyone else. 23 Q. Anyone else on the whole island. I 24 don't just mean with him. I mean did 25 Mr. Epstein have other guests with him at</p>

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<p>1        G. Maxwell - Confidential  2        that time?  3        A. I don't recall anybody else.  4        Q. How did you arrive there?  5        A. I don't know.  6        Q. Did you come with Mr. Epstein?  7        A. I don't know, I'm sorry.  8        Q. How did Mr. Dershowitz arrive  9        there?  10      A. Again, I don't know.  11      Q. Did he come with Mr. Epstein?  12      A. I don't know.  13      Q. Other than that one time that you  14     say you were at the Virgin Island property  15     with Mr. Dershowitz, had you ever met  16     Mr. Dershowitz in Mr. Epstein's presence?  17     MR. PAGLIUCA: This is outside of  18     the court's order. I will tell you not  19     to answer that question.  20     THE WITNESS: Okay.  21     Q. Did Mr. Dershowitz ever receive a  22     massage at any of Mr. Epstein's properties?  23     A. I don't recall.  24     Q. Did you ever have any conversations  25     with Mr. Dershowitz?</p>	<p>1        G. Maxwell - Confidential  2        Q. I'm not now asking you about a  3        conversation.  4        A. What are you asking me? Sorry.  5        Q. Do you recall ever seeing  6     Mr. Dershowitz at any of Mr. Epstein's  7     residences other than the Virgin Island  8     property?  9        A. I don't have any specific  10     recollection.  11       Q. Do you have a general recollection?  12       A. I have a general recollection that  13     I have seen him, but I just don't have any  14     other memory of it. I know I met him. I  15     just don't recall where or when, except for  16     that singular event on the island.  17       Q. When you say you have a general  18     recollection that you have seen him, do you  19     mean you have a general recollection that you  20     have seen him at Mr. Epstein's properties  21     other than the Virgin Islands?  22       A. It's just a general recollection,  23     but I have no specific memory of seeing him.  24       Q. All I'm trying to do is find out  25     whether your general recollection is a</p>
Page 167	Page 169
<p>1        G. Maxwell - Confidential  2        MR. PAGLIUCA: You don't have to  3        answer that question. About what,  4        anything?  5        Q. Did you ever have any conversations  6     with Mr. Dershowitz at Mr. Epstein's  7     properties?  8        A. I did, about metal detecting.  9        Q. Anything else?  10       A. I only recall metal detecting.  11       Q. Where did that conversation take  12     place?  13       A. As I was metal detecting.  14       Q. I said where?  15       A. On the island.  16       Q. That's the only conversation that  17     you recall, is that your testimony?  18       A. Yes, that is my testimony.  19       Q. Do you recall ever seeing  20     Mr. Dershowitz at any of Mr. Epstein's  21     residences other than the Virgin Island  22     property?  23       A. That's the only specific memory I  24     have of the conversation that I recall  25     because it was something special.</p>	<p>1        G. Maxwell - Confidential  2        general recollection of having seen him  3        someplace in the world or whether you have a  4        general recollection of having seen him at  5        Mr. Epstein's properties?  6        A. I'm sorry, I really can't answer.  7        I just don't know. The only memory I have of  8        him is on the island, and I don't have any  9        additional memory of him anywhere else.  10       Q. I mentioned a woman by the name of  11       [REDACTED] before. Are you familiar with a  12       [REDACTED] And I don't mean to imply  13       they are the same people.  14       A. Is this on any of these lists that  15     you gave me?  16       Q. It could have been on the first  17     list. I don't think so.  18       A. Is it on this list?  19       Q. It's not on the second list.  20       A. So what's your question?  21       Q. Are you familiar with a woman named  22       [REDACTED]  23       A. I'm familiar with the name, yes.  24       Q. Who is that person?  25       A. I don't recall who she is.</p>

Confidential

<p style="text-align: right;">Page 170</p> <p>1 G. Maxwell - Confidential      2 Q. What is [REDACTED] connection      3 to Mr. Epstein?      4 A. I don't know.      5 Q. Did you ever speak to [REDACTED]      6 [REDACTED]      7 A. I don't recall. I know her name,      8 and that's all I can -- I don't recall a      9 conversation with her. I don't recall who      10 she is at this point.      11 Q. Was [REDACTED] someone who      12 provided massages for Mr. Epstein?      13 A. I don't believe so.      14 Q. Did [REDACTED] perform any      15 services for Mr. Epstein?      16 MR. PAGLIUCA: Objection to form      17 and foundation.      18 A. I have no idea, I'm sorry.      19 Q. When did you first become aware of      20 charges that Mr. Epstein was having sex with      21 a significant number of people at his      22 residences?      23 MR. PAGLIUCA: You don't have to      24 answer that question. It's outside of      25 the court's order.</p>	<p style="text-align: right;">Page 172</p> <p>1 G. Maxwell - Confidential      2 [REDACTED]      3 [REDACTED]      4 [REDACTED]      5 [REDACTED]      6 [REDACTED]      7 [REDACTED]      8 A. Are you giving me a timeframe here,      9 because it's been a long time. I'm assuming      10 he is having sexual relations today. You      11 have to bind it to some time.      12 Q. You don't know who he is having      13 sexual relationships with today, do you?      14 A. No.      15 Q. So you can only tell me who      16 Mr. Epstein was having sexual relationships      17 with at a time when you knew about it,      18 correct?      19 A. I have no knowledge of him actually      20 having sex with anybody else outside of what      21 we have identified.      22 [REDACTED]      23 Q. Now, there came a time when you      24 learned that people were asserting that he      25 had had sexual activities with a lot more</p>
<p style="text-align: right;">Page 171</p> <p>1 G. Maxwell - Confidential      2 Q. You have testified that you were      3 only aware of a few people that Mr. Epstein      4 had sex with or engaged in sexual activities      5 with at his residences, correct?      6 MR. PAGLIUCA: Objection to form      7 and foundation.      8 A. I didn't say that.      9 Q. How many people are you aware of      10 that Mr. Epstein engaged in sexual activities      11 with at his residences?      12 A. I'm not aware.      13 Q. You are aware of some?      14 A. Well, the ones that we've      15 discussed, but that's all I'm aware of.      16 Q. That's my question.      17 A. Then I can concur, yes.      18 Q. Let's be clear. You have      19 identified three people.      20 [REDACTED]      [REDACTED]      [REDACTED]</p>	<p style="text-align: right;">Page 173</p> <p>1 G. Maxwell - Confidential      2 than those three people at his residences,      3 correct? During the period of time that you      4 were involved with Mr. Epstein, correct?      5 A. Like everybody else, like the rest      6 of the world, when it was announced in the      7 papers.      8 Q. Yes.      9 And that was during 2005?      10 A. Whenever it was.      11 Q. At that point, did you do anything      12 to try to find out whether those assertions      13 were or were not accurate?      14 MR. PAGLIUCA: You don't have to      15 answer that. That's outside the court's      16 order.      17 Q. When you heard that there were      18 assertions that Mr. Epstein had engaged in      19 sexual activities with people who you had met      20 at Mr. Epstein's residences, did you do      21 anything to determine whether those      22 assertions were or were not accurate?      23 MR. PAGLIUCA: Objection to form      24 and foundation, and you don't have to      25 answer that question. It's outside the</p>

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Page 174	Page 176
<p>1 G. Maxwell - Confidential 2 court's order. 3 Q. In terms of preparing for this 4 deposition, what documents did you review? 5 MR. PAGLIUCA: To the extent I 6 provided you with any documents to 7 review, I will tell you that's both -- 8 it's privileged and I instruct you not 9 to answer. 10 Q. Did your lawyer provide you with 11 any documents to review in preparation for 12 this deposition that refreshed your 13 recollection about any of the events that 14 occurred? 15 MR. PAGLIUCA: You can answer that 16 question. 17 A. No. 18 Q. How many documents did your lawyer 19 provide you with? 20 MR. PAGLIUCA: You can answer. 21 A. One, I believe. 22 Q. One document. Was that a document 23 that had been prepared by your attorney, or 24 was it a document from the past? 25 MR. PAGLIUCA: I will tell you not</p>	<p>1 G. Maxwell - Confidential 2 sexual activities with [REDACTED] 3 MR. PAGLIUCA: Objection to form 4 and foundation. 5 A. I didn't have any reason -- I had 6 no idea whether they were or weren't. 7 Q. Were you with Mr. Epstein in 2005 8 when the Palm Beach police launched their 9 investigation? 10 MR. PAGLIUCA: You don't have to 11 answer the question. That's outside the 12 court's order. 13 Q. When the Palm Beach police launched 14 their investigation in 2005, did you make any 15 effort to retain records of the women who had 16 been present at Mr. Epstein's residences in 17 the prior period? 18 MR. PAGLIUCA: Don't answer that 19 question. It's outside the court's 20 order. 21 Q. When the Palm Beach police launched 22 their investigation in 2005, were you aware 23 of any effort to destroy records of women who 24 had been present at Mr. Epstein's residences 25 in the prior period?</p>
Page 175	Page 177
<p>1 G. Maxwell - Confidential 2 to answer that question. 3 Q. Was the document that your attorney 4 showed you a document that you had ever seen 5 before? 6 MR. PAGLIUCA: Again, don't answer 7 questions about what I showed you or 8 didn't show you. 9 She already testified that nothing 10 refreshed her recollection. 11 MR. BOIES: I don't have to accept 12 that answer. I can ask these questions, 13 and I think these are clearly not 14 privileged questions. 15 Q. Do you know a [REDACTED] 16 A. I do. 17 Q. Who is [REDACTED] 18 A. She was a friend of Jeffrey's. 19 Q. Was [REDACTED] someone with whom 20 Mr. Epstein engaged in sexual activities? 21 MR. PAGLIUCA: Objection to form 22 and foundation. 23 A. I don't know. 24 Q. Did you ever have any reason to 25 believe that Mr. Epstein was engaged in</p>	<p>1 G. Maxwell - Confidential 2 MR. PAGLIUCA: Don't answer that 3 question. It's outside the court's 4 order. 5 Q. In 2005, were you aware of any 6 effort to destroy records of messages you had 7 taken of women who had called Mr. Epstein in 8 the prior period? 9 MR. PAGLIUCA: Don't answer that 10 question. It's outside the court's 11 order. 12 MR. BOIES: I said I would give you 13 a break every hour. It's been an hour. 14 MR. PAGLIUCA: Do you want a break 15 or do you want to keep going? 16 THE WITNESS: Keep going. 17 MR. BOIES: What I told you before, 18 you asked for a break every hour. I am 19 happy to give you a break at a fixed 20 time. What I'm not happy to do is 21 interrupt a chain of examination. 22 So if you want a break now, we will 23 take a break now. If you don't want a 24 break now, we will not break for another 25 hour.</p>

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<p>1 G. Maxwell - Confidential</p> <p>2 MR. PAGLIUCA: Is there a rule that</p> <p>3 you can point me to that mandates that</p> <p>4 you get to control the time and place of</p> <p>5 breaks?</p> <p>6 MR. BOIES: No. We will take a</p> <p>7 break now, because if what you are going</p> <p>8 to do is say, you said at the very</p> <p>9 beginning of this thing that you wanted</p> <p>10 to have a rule that every hour we took a</p> <p>11 break, and I said that was fine with me,</p> <p>12 but I just didn't want you taking a</p> <p>13 break, particularly since you reserve</p> <p>14 the right to talk to your client during</p> <p>15 breaks, in the middle of an examination.</p> <p>16 Now you are saying let's continue</p> <p>17 for a while but I am not agreeing to</p> <p>18 continue for the next hour. We will</p> <p>19 take a break, and we will come back and</p> <p>20 we will go from there.</p> <p>21 MR. PAGLIUCA: We will take a break</p> <p>22 at your request now, and then if I want</p> <p>23 to take a break, we will take another</p> <p>24 break.</p> <p>25 MR. BOIES: If you take a break to</p>	<p>1 G. Maxwell - Confidential</p> <p>2 Q. I would like to go down those names</p> <p>3 and see if any of those people are people</p> <p>4 that you recognize. However you think is</p> <p>5 best, we can go name by name, or you can tell</p> <p>6 me which ones you recognize and which ones</p> <p>7 you don't.</p> <p>8 A. I recognize [REDACTED]. I recognize</p> <p>9 [REDACTED]. These are</p> <p>10 names that ring bells, nothing else.</p> <p>11 [REDACTED] I recognize the name.</p> <p>12 Q. Where is [REDACTED]</p> <p>13 A. [REDACTED]. I just recognize</p> <p>14 these names. It doesn't mean anything else.</p> <p>15 I'm just recognizing names.</p> <p>16 [REDACTED].</p> <p>17 Let me do it again and make sure I</p> <p>18 didn't miss anyone. That's it.</p> <p>19 Q. Now, with respect to the people</p> <p>20 that you say you recognized the names of,</p> <p>21 [REDACTED], were</p> <p>22 any of those people, people who provided</p> <p>23 massages to Mr. Epstein?</p> <p>24 MR. PAGLIUCA: Objection to form</p>
<p>Page 179</p> <p>1 G. Maxwell - Confidential</p> <p>2 talk to your witness, I guarantee you</p> <p>3 there will be a motion for sanctions. I</p> <p>4 think what you're doing with this</p> <p>5 witness is inappropriate. I think your</p> <p>6 instructions not to answer,</p> <p>7 conversations that you had with her</p> <p>8 while she is under oath and under</p> <p>9 examination is inappropriate.</p> <p>10 THE VIDEOGRAPHER: It's 2:18 p.m.,</p> <p>11 and we are off the record.</p> <p>12 (Recess.)</p> <p>13 THE VIDEOGRAPHER: The time is 2:28</p> <p>14 p.m. This also begins DVD No. 6.</p> <p>15 BY MR. BOIES:</p> <p>16 Q. Let me hand you a document that has</p> <p>17 been previously marked as Maxwell Exhibit 13.</p> <p>18 And I would like you to turn to page 91 of</p> <p>19 that exhibit. And you see the heading that</p> <p>20 says, "Massage-Florida"?</p> <p>21 A. Actually, I don't -- yes, I do,</p> <p>22 sorry.</p> <p>23 Q. Then you see a list of telephone</p> <p>24 numbers with names?</p> <p>25 A. I do.</p>	<p>Page 181</p> <p>1 G. Maxwell - Confidential</p> <p>2 and foundation.</p> <p>3 A. Sorry, I guess. I believe [REDACTED]</p> <p>4 did, and I believe -- I think that's it that</p> <p>5 I know of, I think.</p> <p>6 Q. Now, just going down the names of</p> <p>7 people that you did not recognize, I take it</p> <p>8 you are not aware or recognize the name [REDACTED]</p> <p>9 first name?</p> <p>10 A. It was just a first name. I can't</p> <p>11 think of a [REDACTED] at this point.</p> <p>12 Q. The same thing is true for [REDACTED]</p> <p>13 A. I don't recognize [REDACTED].</p> <p>14 Q. And [REDACTED]</p> <p>15 A. I don't recognize [REDACTED].</p> <p>16 Q. And [REDACTED]</p> <p>17 A. Is that [REDACTED] Where is that?</p> <p>18 That's [REDACTED], I'm sorry, I missed her.</p> <p>19 That would probably be [REDACTED].</p> <p>20 I think [REDACTED] might have been a</p> <p>21 masseuse as well. There is a [REDACTED] in the</p> <p>22 back of my head.</p> <p>23 Q. [REDACTED]</p> <p>24 A. I don't know who that is.</p> <p>25 Q. What about [REDACTED]</p>

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<p>1 G. Maxwell - Confidential 2 A. No. 3 Q. What about [REDACTED] 4 A. No. 5 Q. [REDACTED] 6 A. No. 7 Q. [REDACTED] 8 A. I didn't think I know a [REDACTED] 9 period. 10 Q. [REDACTED] 11 A. No. 12 Q. Is that Virginie? 13 A. I don't know what that is. 14 Q. Then there is a [REDACTED] or [REDACTED] 15 Do you see that? 16 A. I don't see that. 17 Q. It's right after Virginia, which is 18 right after [REDACTED] 19 A. I see it. I don't know who that 20 is. 21 Q. How about [REDACTED] 22 A. No idea. 23 Q. There is someone here [REDACTED], and 24 described as a redhead? 25 A. I don't know who that is.</p>	<p>Page 182</p> <p>1 G. Maxwell - Confidential 2 Q. Next one is [REDACTED] -- 3 A. [REDACTED] is Virginia's guy that you 4 asked me about. I don't know [REDACTED]. 5 Q. I asked you about a [REDACTED]. 6 A. Right, I don't know him, so I'm 7 guessing, I don't know him. 8 Q. [REDACTED] 9 A. No. 10 Q. [REDACTED] 11 A. No. 12 Q. [REDACTED] 13 A. I don't know who these people are. 14 Q. Was there a list that was kept of 15 women or girls who provided massages? 16 MR. PAGLIUCA: This has been 17 previously deposed on. This is not part 18 of the court's order, I will tell her 19 not to answer. 20 MR. BOIES: You are going to tell 21 her not to answer a question that says 22 was there a list of women or girls who 23 provided massages? 24 MR. PAGLIUCA: She has been 25 previously deposed on this subject.</p>
<p>1 G. Maxwell - Confidential 2 Q. [REDACTED] 3 A. No. 4 Q. And there is a [REDACTED] 5 A. I don't know. 6 Q. [REDACTED] 7 A. No idea. 8 Q. Then there is [REDACTED] 9 A. That's a name that keeps coming up. 10 I recognize the name, but I don't know her in 11 particular. 12 Q. What about [REDACTED] 13 A. I have no idea who that is. 14 Q. [REDACTED] 15 A. No idea. 16 Q. Somebody that's listed as 17 [REDACTED], Virginia's friend? 18 A. No. 19 Q. [REDACTED], do you know who that 20 is? 21 A. No. 22 Q. How about [REDACTED] friend? 23 A. No. 24 Q. Do you know who [REDACTED] is? 25 A. No.</p>	<p>Page 183</p> <p>1 G. Maxwell - Confidential 2 MR. BOIES: I think this is 3 squarely in the court's order, but if 4 you instruct her not to answer, you 5 instruct her not to answer. 6 MR. PAGLIUCA: We'll find out. 7 BY MR. BOIES: 8 Q. I take it you don't know the ages 9 of any of these people? 10 A. The ones that I did recognize were 11 roughly my age. The ones I don't know, I 12 wouldn't have a clue. 13 Q. Did you, or insofar as you are 14 aware anyone, maintain a list of females that 15 provided massage services to Mr. Epstein at 16 his residences? 17 MR. PAGLIUCA: Objection to form 18 and foundation. 19 You can answer if you can. 20 A. I don't know anything about a list. 21 Q. Let me go back to Exhibit 28. I 22 want to go down this list, excluding 23 Mr. Epstein himself, and just ask you a 24 series of the same essential questions about 25 each one.</p>

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1 G. Maxwell - Confidential  
 2 [REDACTED], which of Mr. Epstein's  
 3 residences did you see [REDACTED] at?

4 A. I don't have a memory of [REDACTED]  
 5 where I would have seen her.

6 Q. Did you see her at some residence  
 7 or property?

8 A. I did.

9 Q. Of Mr. Epstein?

10 A. I did.

11 Q. You just can't remember which ones,  
 12 is that fair?

13 A. Yes, that's fair.

14 Q. [REDACTED], which residences of  
 15 Mr. Epstein did you see [REDACTED] at?

16 A. I don't actually recall meeting  
 17 [REDACTED], so I can't recall.

18 Q. So [REDACTED] may be somebody  
 19 who you never met, is that your testimony?

20 A. No, I'm not saying that. I just  
 21 don't recall her really at all. I'm sorry, I  
 22 don't recall.

23 Q. Did you see [REDACTED] at some  
 24 residence or property of Mr. Epstein?

25 A. I don't recall.

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2 Q. [REDACTED], what properties of  
 3 Mr. Epstein did you see [REDACTED] at?

4 A. Palm Beach, and I believe New  
 5 Mexico and New York.

6 Q. And [REDACTED]

7 A. Palm Beach, I believe.

8 Q. And what was [REDACTED] doing at  
 9 Palm Beach when you saw her?

10 A. If I remember correctly, she was a  
 11 real estate broker.

12 Q. Did you see [REDACTED] at  
 13 Mr. Epstein's Virgin Island property?

14 A. I don't recall.

15 Q. When you saw [REDACTED] in Palm  
 16 Beach and New Mexico and New York, what was  
 17 she doing?

18 A. I don't know.

19 Q. Do you know why she was there?

20 A. I think she was just a friend.

21 Q. A friend of Mr. Epstein's?

22 A. Yeah.

23 Q. [REDACTED], what Epstein  
 24 properties did you see her at?

25 MR. PAGLIUCA: I will now tell you

1 G. Maxwell - Confidential  
 2 not to answer these questions anymore.  
 3 These do not appear -- I let this go on,  
 4 they don't appear to be tied to the  
 5 court's order as relating to sex or  
 6 massages or anything that's contained in  
 7 the order. This is just simply what was  
 8 somebody doing at some property at some  
 9 point in time. So don't answer these  
 10 questions.

11 Q. It is your assertion that, leaving  
 12 Mr. Epstein aside, none of the people on this  
 13 list engaged in sexual activities with either  
 14 you or Mr. Epstein, correct?

15 MR. PAGLIUCA: Objection to form  
 16 and foundation.

17 A. I can only testify to myself. I  
 18 cannot testify to Mr. Epstein.

19 Q. With respect to Mr. Epstein, do you  
 20 know, one way or another, whether any of  
 21 these people engaged in sexual activities?

22 A. With respect to Mr. Epstein, how  
 23 would I know that?

24 Q. The answer is lots of ways, but all  
 25 I can do is ask you whether you know it or

1 G. Maxwell - Confidential

2 not.

3 A. I don't.  
 4 Q. Do you have any reason to believe  
 5 -- because I don't want to get stuck on your  
 6 concept of personal knowledge -- do you have  
 7 any reason to believe that any of the people  
 8 on this list had sexual activities with  
 9 Mr. Epstein?

10 A. I do not.

11 Q. Do you have any reason to believe  
 12 that any of these people had massages at any  
 13 Epstein property?

14 A. I have no idea. It's entirely  
 15 possible, but I have no idea.

16 Q. Do you have any reason to believe  
 17 that any of the people on this list, other  
 18 than Mr. Epstein himself, engaged in sexual  
 19 activities with anyone on Mr. Epstein's  
 20 properties?

21 A. I have no reason to believe that.

22 Q. Let me go to [REDACTED].  
 23 I asked you some questions about [REDACTED]  
 24 [REDACTED] earlier and about a possible visit  
 25 to that residence of a [REDACTED]. Do you

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<p style="text-align: right;">Page 190</p> <p>1        G. Maxwell - Confidential      2 recall that subject generally?      3        A. I recall you asking me a question      4 about it, yes, I do.      5        Q. Let me ask about another time at      6 the [REDACTED]. Were you ever at the      7 [REDACTED] with people who worked at the      8 Epstein residence?      9        MR. PAGLIUCA: Objection to form      10 and foundation.      11        A. No.      12        Q. Were you ever at the [REDACTED]      13 [REDACTED] when there were a number of females      14 under the age of 21 dancing?      15        A. Excuse me?      16        Q. Were you ever at the [REDACTED]      17 [REDACTED] when there were a number of females      18 under the age of 21 dancing?      19        A. The only people I have seen dancing      20 at any [REDACTED].      21        Q. Just those children, no other      22 children?      23        A. No other children.      24        Q. Were you ever at the [REDACTED]      25 [REDACTED] when females who you had seen at</p>	<p style="text-align: right;">Page 192</p> <p>1        G. Maxwell - Confidential      2        MR. PAGLIUCA: I want to make a      3 record here before we are done. I do      4 get a chance to speak. Are we going off      5 the record now?      6        MR. BOIES: You want to talk on the      7 record?      8        MR. PAGLIUCA: Yes, is that okay      9 with you?      10        MR. BOIES: You want to ask her      11 questions?      12        MR. PAGLIUCA: No. I want to make      13 a record of your closing of the      14 deposition.      15        MR. BOIES: I don't know how you      16 can make a record of my closing the      17 deposition, but if you want to take up      18 the time and the transcript space to      19 talk as opposed to writing a letter or      20 filing a motion, go for it.      21        MR. PAGLIUCA: To the extent you      22 have questions that are within the      23 court's order that you haven't asked,      24 that I haven't objected to, meaning no      25 other questions, this deposition is</p>
<p style="text-align: right;">Page 191</p> <p>1        G. Maxwell - Confidential      2 the residences of Mr. Epstein, [REDACTED]      3 [REDACTED], were present and dancing?      4        A. Can you ask me the question again?      5        Q. Sure. I'm focusing on [REDACTED]      6 [REDACTED] and I'm focusing on children other      7 than [REDACTED].      8        A. I'm there.      9        Q. I'm asking whether you were ever at      10 [REDACTED] where there were females      11 other than the [REDACTED] who were      12 dancing.      13        A. I've never witnessed --      14        MR. PAGLIUCA: Objection to form      15 and foundation.      16        A. [REDACTED], who I have      17 certainly seen dancing, I don't recall any      18 dancing a [REDACTED] by any      19 other people.      20        MR. BOIES: I think pending      21 resolution of the instructions not to      22 answer, I don't have any further      23 questions at this time. If you give me      24 a minute, just to check.      25        Thank you very much.</p>	<p style="text-align: right;">Page 193</p> <p>1        G. Maxwell - Confidential      2 closed.      3        If there are questions that I have      4 instructed the witness not to answer and      5 it later turns out the judge disagrees      6 with my characterization, we will be      7 back to revisit it, but we are done as      8 far as I'm concerned.      9        MR. BOIES: The deposition is not      10 closed. There are a number of      11 instructions not to answer. I think it      12 is a fair point that if the court were      13 to conclude that none of the questions      14 that have been instructed need to be      15 answered, we're not going to be      16 continuing the deposition, barring some      17 additional information coming to light.      18        MR. PAGLIUCA: I think we agree      19 then.      20        THE VIDEOGRAPHER: The time is 2:51      21 p.m., and we are going off the record.      22        (Time noted: 2:51 p.m.)</p>

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3	INDEX		3	Questions Marked
4	---		4	Page Line Page Line Page Line
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7	By Mr. Boies	4	7	
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1			1	
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3	DEPOSITION SUPPORT INDEX		3	CERTIFICATE
4	---		4	
5	Direction to Witness Not to Answer		5	I HEREBY CERTIFY that GHISLAINE
6	Page Line Page Line Page Line		6	MAXWELL, was duly sworn by me and that the
7	50 22 50 25 51 5		7	deposition is a true record of the testimony
8	51 9 51 17 51 22		8	given by the witness.
9	52 2 81 17 82 6		9	
10	82 25 83 7 94 21		10	
11	95 6 98 12 118 11		11	Leslie Fagin,
12	142 6 142 13 165 16		12	Registered Professional Reporter
13	165 25 169 22 172 13		13	Dated: July 22, 2016
14	172 22 173 4 173 24		14	
15	174 5 175 9 175 17		15	(The foregoing certification of
16	175 25 176 8 183 14		16	this transcript does not apply to any
17	186 23		17	reproduction of the same by any means, unless
18	---		18	under the direct control and/or supervision
19	Request for Production of Documents		19	of the certifying reporter.)
20	Page Line Page Line Page Line		20	
21	None		21	
22	---		22	
23	Stipulations		23	
24	Page Line Page Line Page Line		24	
25	None		25	

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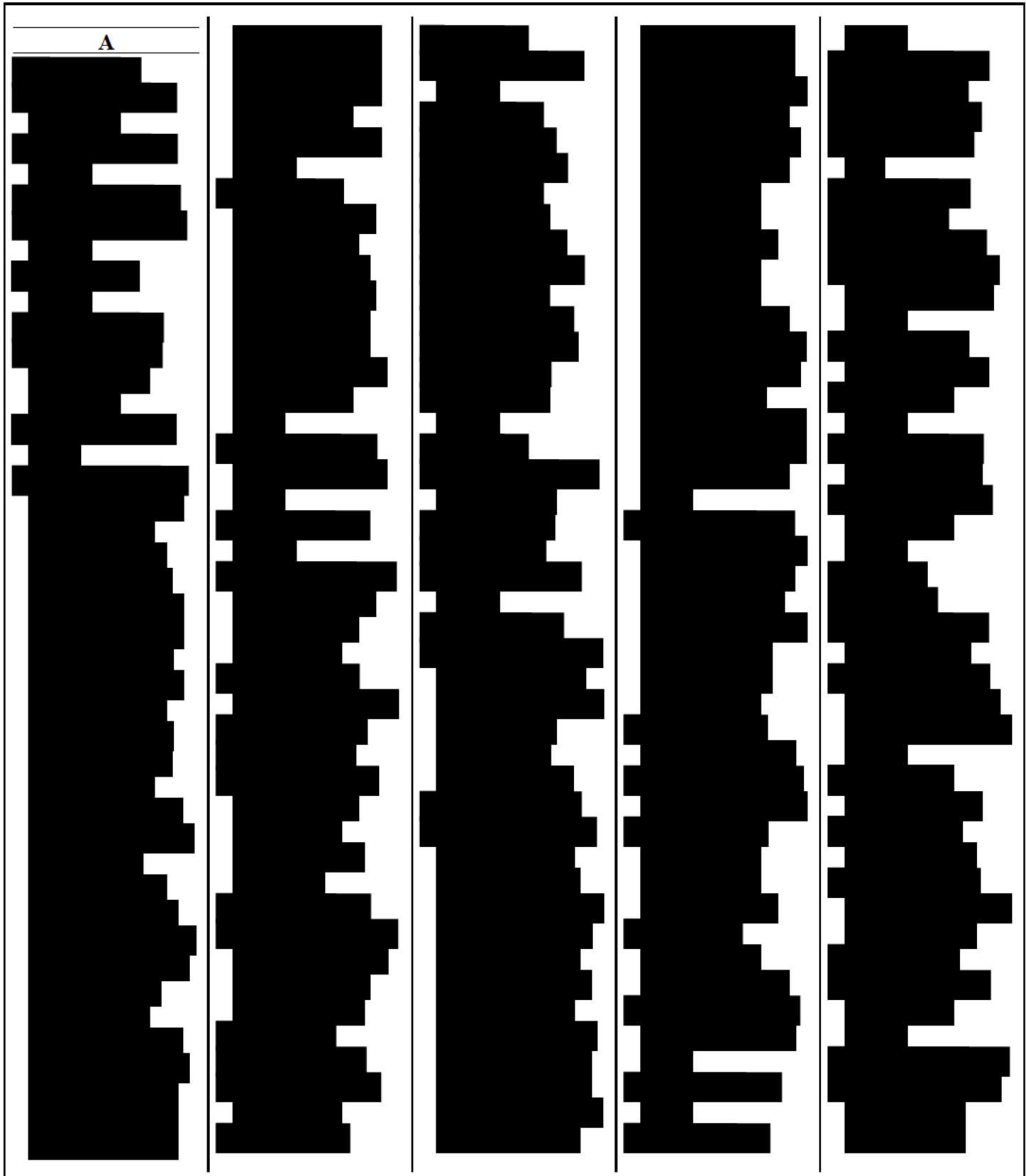
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2       ACKNOWLEDGMENT OF DEPONENT  
3  
45       I,                   , do hereby  
6 certify that I have read the foregoing pages,  
7 and that the same is a correct transcription  
8 of the answers given by me to the questions  
9 therein propounded, except for the  
10 corrections or changes in form or substance,  
11 if any, noted in the attached Errata Sheet.12  
13  
14  
15  
16      GHISLAINE MAXWELL           DATE  
17  
18  
19  
20 Subscribed and sworn  
to before me this  
21      day of                   , 2016.  
22 My commission expires:  
23  
Notary Public  
24  
25

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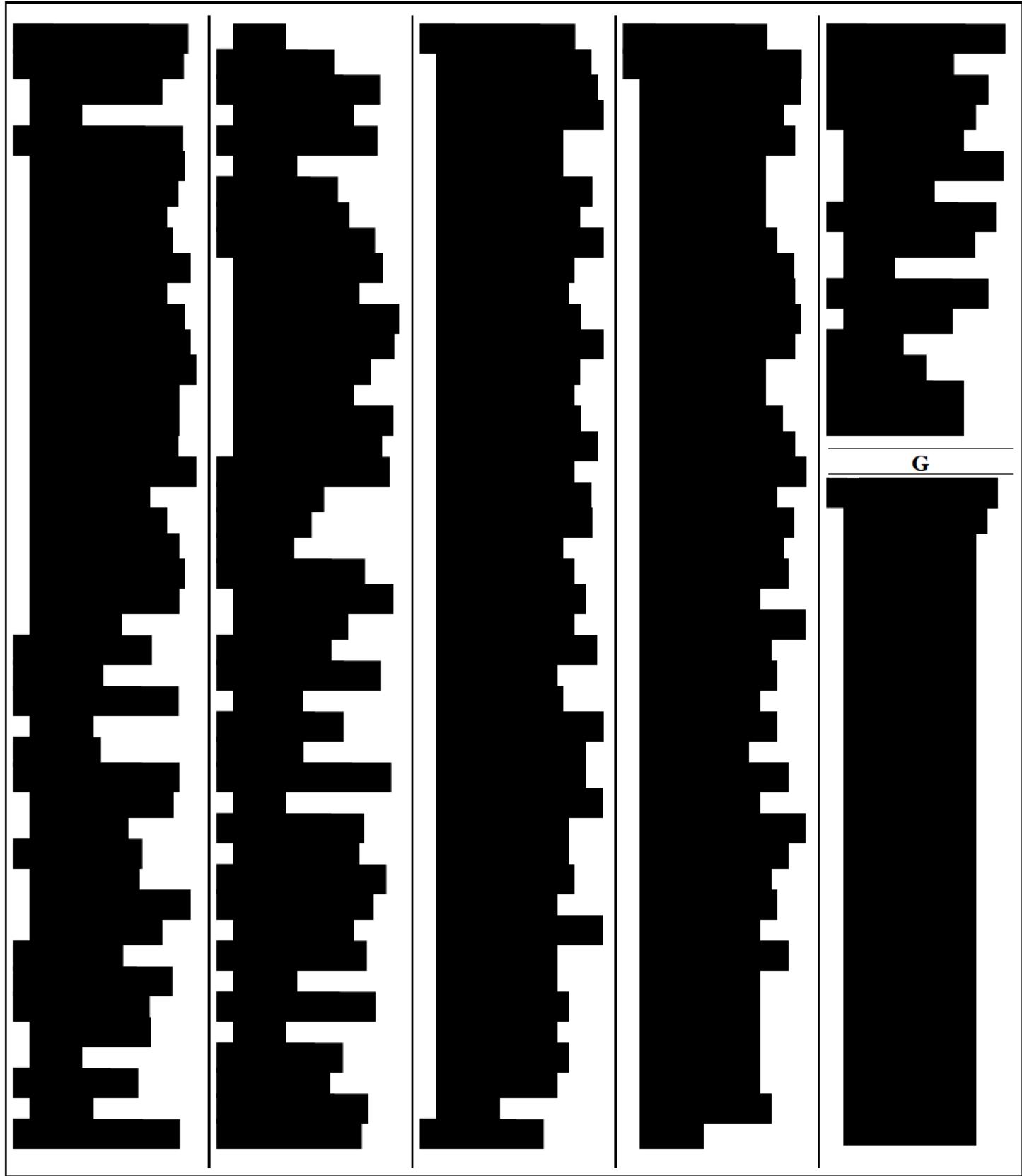
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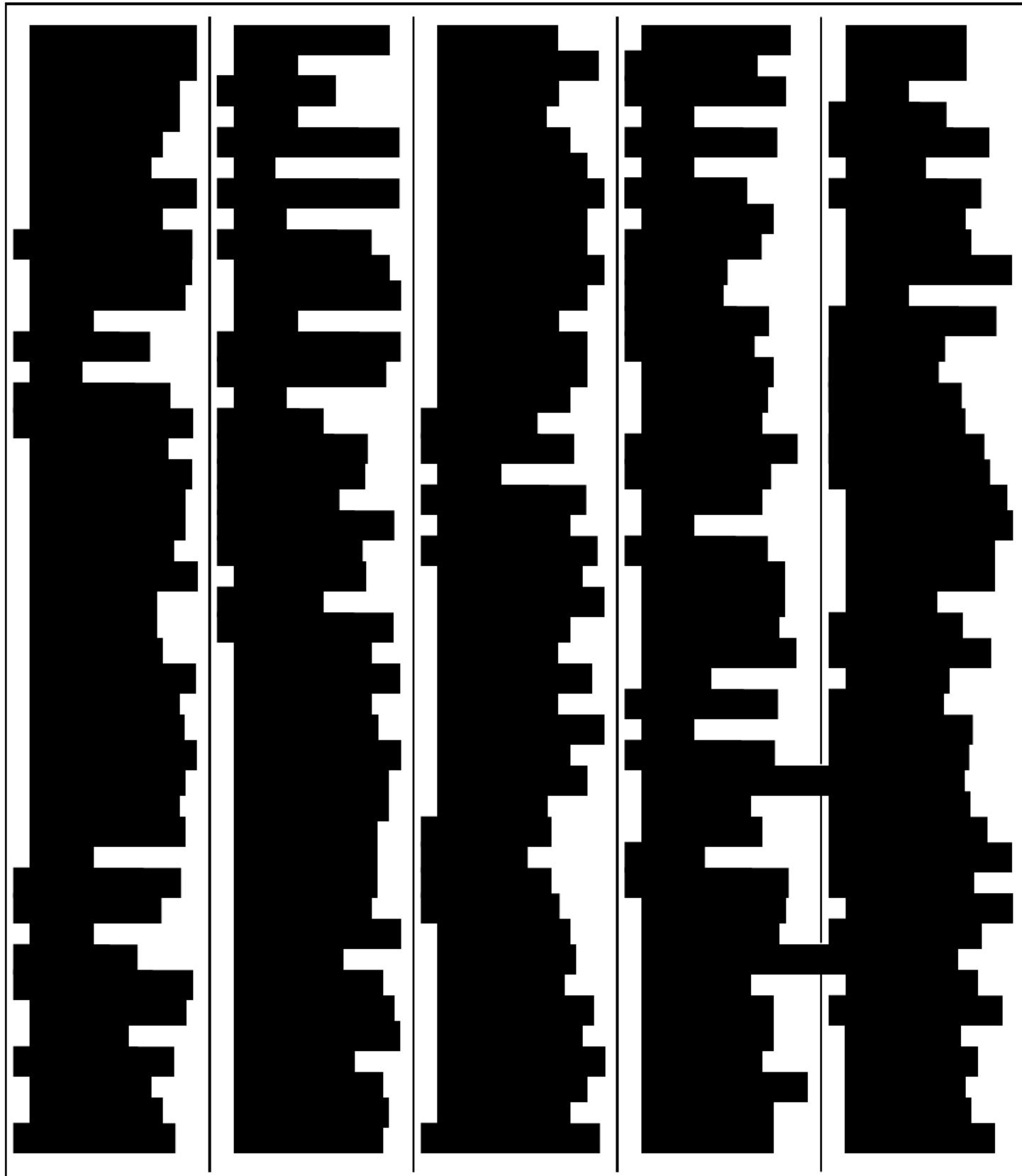
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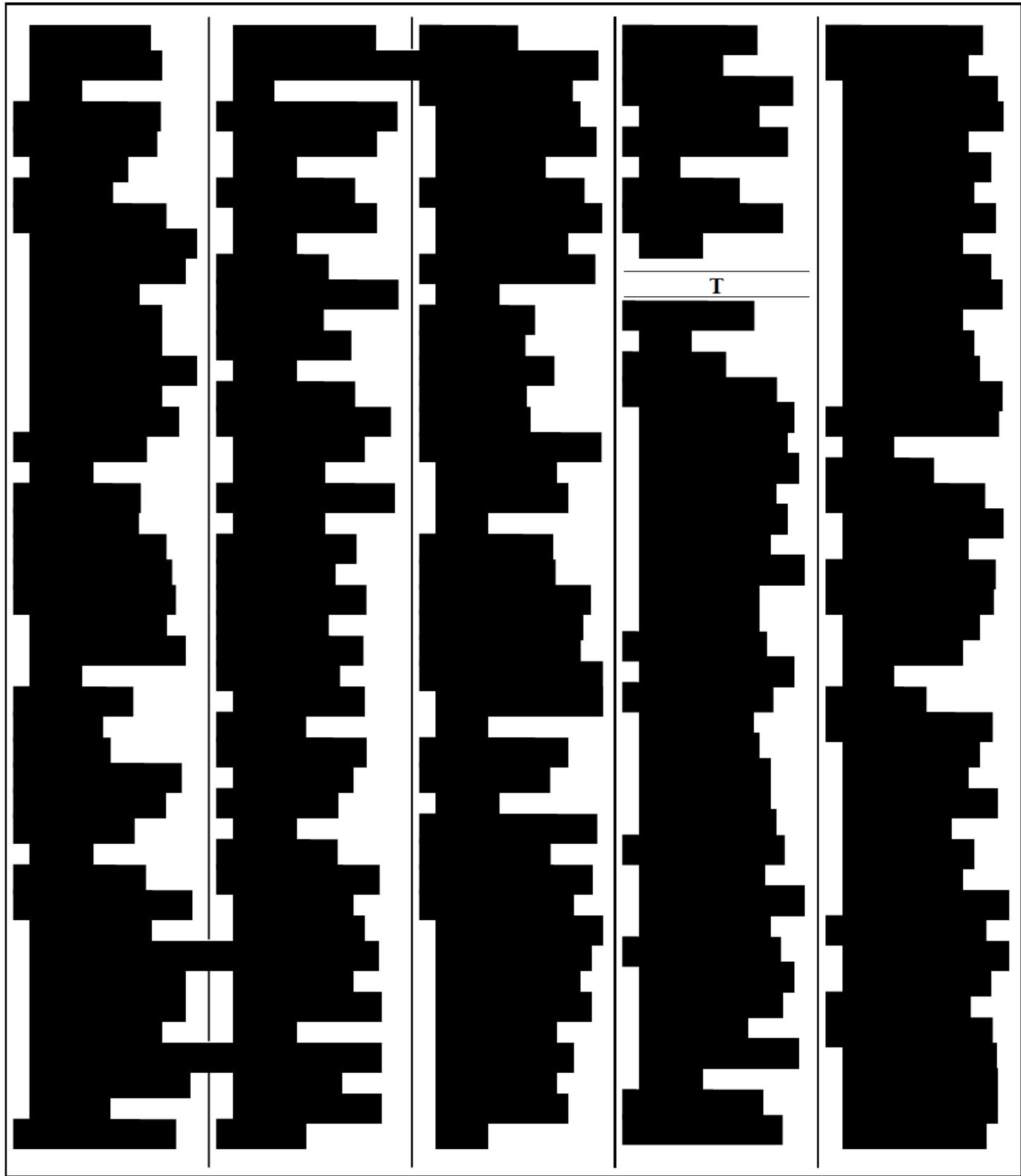
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