

# **EXHIBIT 6**

BOIES, SCHILLER & FLEXNER LLP

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July 14, 2016

**Via Email**

Philip Barden, Esq.  
Devonshires Solicitors  
30 Finsbury Circle  
London, EC2M 7DT

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

Dear Sir:

You have confirmed that you act for Mr. Ross Gow.

In accordance with the Rule 45, Federal Rules of Civil Procedure, our client is entitled to procure evidence in the form of depositions from Mr. Gow, a resident in England, in support of legal proceedings in the U.S. Our client has a subpoena issued with the power of a United States District Court, and seeks to procure Mr. Gow's evidence without recourse to the English courts, if at all possible.

To that end, our client has taken the following steps to procure service of the subpoena.

1. On 17 June 2016, our client commenced service of process pursuant to The Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters, to which both the U.S. and the U.K. are parties. The date for deposition was identified therein as 29 June 2016. A copy of the subpoena is attached.
2. On 1 July 2016, our client commenced separate service of process pursuant to The Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters, notifying Mr. Gow that the date for deposition is now 20 July 2016, at Boies, Schiller & Flexner, 25 Old Broad Street, London EC2N 1HQ. Please confirm whether this subpoena has been received. A copy of the subpoena is attached.
3. On 12 July 2016 (to ensure that costs remain proportionate in this matter, and that your client received the new date of deposition (20 July 2016) at the earliest opportunity), an updated copy of the subpoena was served to you, detailing the new date for deposition as 20 July 2016. A copy of the subpoena is attached.

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To date, our client has not separately invoked the Evidence (Proceedings in Other Jurisdictions) Act 1975. It hopes this will be unnecessary on the basis that Mr. Gow will cooperate and sit for his deposition following receipt of the above subpoena, or voluntarily.

If you do not confirm before 18 July 2016 that this is in fact the case, we will be forced to: (1) consider our clients options with regard to the subpoena in the U.S. courts; (2) and/or seek an English court order pursuant to the Evidence (Proceedings in Other Jurisdictions) Act 1975. In both instances, we will seek recovery of the cost of doing so from Mr. Gow.

Our strong preference is to proceed in a sensible and efficient manner for all concerned. If a new date or location is preferred, we would be prepared to consider this. Please advise how you would like to proceed in this matter.

To the extent that you consider service has been defective, please confirm whether you waive service of process and accept service of the subpoena on Mr. Gow's behalf. To the extent that you consider Mr. Gow has not yet received notice of the updated date for the deposition, we notify you herewith.

For the avoidance of any doubt, we strongly reject any assertions that we are harassing your client. Additionally, as it is now known that he is represented by counsel in this matter, I will direct all communications regarding this matter to you.

Sincerely,



Meredith L. Schultz

MLS:dk  
Enclosures