

COMPOSITE  
EXHIBIT 1  
(File Under Seal)



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

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August 16, 2016

**VIA EMAIL**

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

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

Dear Sigrid:

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

Also attached are two documents Bates numbered GM\_01141-01144. These emails were collected as responsive to Plaintiff's First Request for Production of Documents in February 2016 but through clerical error were not produced at that time or following the Court's *in camera* review in April. A recent review of documents revealed the error.

Sincerely,

HADDON, MORGAN AND FOREMAN, P.C.

/s/ Laura A. Menninger  
Laura A. Menninger

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

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

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

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

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

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

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



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Please consider the environment before printing this email.

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

ok

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

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

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

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

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[THE DAILY CATCH](#)[the](#)

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

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

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please note

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