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United States District Court For The Southern District of New York

Giuffre v. Maxwell 15-cv-07433-RWS

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

TAB	DATE	DOC. TYPE	FROM	то	CC	RELATIONSH IP	SUBJECT MATTER	PRIVILEGE
1.	2011.03.15	E-Mails	Ghislaine	Brett Jaffe, Esq.		Attorney /	Communication	Attorney-Client
			Maxwell			Client	re: legal advice	
2.	2011.03.15	E-Mails	Brett Jaffe,	Ghislaine Maxwell		Attorney /	Communication	Attorney-Client
			Esq.			Client	re: legal advice	
3.	2015.01.02	E-Mails	Ross Gow	Ghislaine Maxwell		Attorney	Communication	Attorney-Client
						Agent /	re: legal advice	
4.	2015.01.02	E-Mail	Ghislaine	Ross Gow		Attorney	Communication	Attorney-Client
			Maxwell			Agent /	re: legal advice	
5.	2015.01.02	E-Mail	Ross Gow	Ghislaine Maxwell	Brian Basham	Attorney	Communication	Attorney-Client
						Agent /	re: legal advice	
6.	2015.01.06	E-Mail	Ghislaine	Jeffrey Epstein		Common	Communication	Common Interest
			Maxwell			Interest	re: legal advice	
7.	2015.01.06	E-Mail	Ghislaine	Jeffrey Epstein,		Attorney /	Communication	Common Interest
			Maxwell	Alan Dershowitz, Esq.		Client	re: legal advice	
8.	2015.01.10	E-Mail	Ghislaine	Philip Barden, Esq., Ross		Attorney /	Communication	Attorney-Client
			Maxwell	Gow		Client	re: legal advice	
9.	2015.01.10	E-Mail	Ghislaine	Philip Barden, Esq.		Client /	Communication	Attorney-Client
			Maxwell			Attorney	re: legal advice	
10.	2015.01.09	E-Mails	Ross Gow	Philip Barden, Esq.	G.	Agent /	Communication	Attorney-Client
	2015.01.10				Maxwell	Attorney /	re: legal advice	
11.	2015.01.11	E-Mail	Ghislaine	Jeffrey Epstein		Common	Communication	Common Interest
			Maxwell			Interest	re: legal advice	
12.	2015.01.11	E-Mail	Philip Barden,	Ross Gow	G.	Attorney /	Communication	Attorney-Client
			Esq.		Maxwell	Agent / Client	re: legal advice	
13.	2015.01.11	E-Mail	Philip Barden,	Ghislaine Maxwell	Ross Gow	Attorney /	Communication	Attorney-Client
			Esq.			Agent / Client	re: legal advice	
14.	2015.01.11 -	E-Mails	Jeffrey Epstein	Ghislaine Maxwell		Common	Communication	Common
	2015.01.17					Interest	re: legal advice	Interest

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TAB	DATE	DOC.	FROM	ТО	CC	RELATIONSHI		PRIVILEGE
		TYPE				P	MATTER	
15.	2015.01.13	E-Mail	Ghislaine	Jeffrey Epstein		Common	Communication	Common
			Maxwell			Interest	re: legal advice	Interest
16.	2015.01.13	E-Mail	Philip Barden,	Martin Weinberg, Esq.		Common	Communication	Common
			Esq.			Interest	re: legal advice	Interest
								Privilege
17.	2015.01.13	E-Mails	Philip Barden,	Ghislaine Maxwell	Mark Cohen	Attorney /	Communication	Attorney-Client
			Esq.			Client	re: legal advice	-
18.	2015.01.21	E-Mail	Ross Gow	Philip Barden, Esq.,		Agent /	Communication	Attorney-Client
				Ghislaine Maxwell		Attorney /	re: legal advice	-
19.	2015.01.21 -	E-Mails	Jeffrey Epstein	Ghislaine Maxwell		Common	Communication re:	Common Interest
	2015.01.27					Interest	legal advice	Privilege
20.	2015.01.21-	E-Mails	Ghislaine	Jeffrey Epstein		Common	Communication re:	Common Interest
	2015.01.27					Interest	legal advice	Privilege

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DATE	DOC. TYPE	FROM	ТО	CC	RELATIONSHIP OF PARTIES	SUBJECT MATTER	PRIVILEGE
2011.03.15	E-Mails	Ghislaine Maxwell	Brett Jaffe, Esq.		Attorney / Client	Communication re: legal advice	Attorney-Client
2011.03.15	E-Mails	Brett Jaffe, Esq.	Ghislaine Maxwell		Attorney / Client	Communication re: legal advice	Attorney-Client
2015.01.02	E-Mails	Ross Gow	Ghislaine Maxwell		Attorney Agent / Client	Communication re: legal advice	Attorney-Client
2015.01.02	E-Mail	Ghislaine Maxwell	Ross Gow		Attorney Agent / Client	Communication re: legal advice	Attorney-Client
2015.01.02	E-Mail	Ross Gow	Ghislaine Maxwell	Brian Basham	Attorney Agent / Client	Communication re: legal advice	Attorney-Client
2015.01.06	E-Mail	Ghislaine Maxwell	Jeffrey Epstein		Common Interest	Communication re: legal advice	Common Interest
2015.01.06	E-Mail	Ghislaine Maxwell	Jeffrey Epstein, Alan Dershowitz, Esq.		Attorney / Client	Communication re: legal advice	Common Interest
2015.01.10	E-Mail	Ghislaine Maxwell	Philip Barden, Esq., Ross Gow		Attorney / Client	Communication re: legal advice	Attorney-Client
2015.01.10	E-Mail	Ghislaine Maxwell	Philip Barden, Esq.		Client / Attorney	Communication re: legal advice	Attorney-Client
2015.01.09 2015.01.10	E-Mails	Ross Gow	Philip Barden, Esq.	G. Maxwell	Agent / Attorney / Client	Communication re: legal advice	Attorney-Client
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2015.01.11	E-Mail	Philip Barden, Esq.	Ross Gow	G. Maxwell	Attorney / Agent / Client	Communication re: legal advice	Attorney-Client
2015.01.11	E-Mail	Philip Barden, Esq.	Ghislaine Maxwell	Ross Gow	Attorney / Agent / Client	Communication re: legal advice	Attorney-Client
2015.01.11 - 2015.01.17	E-Mails	Jeffrey Epstein	Ghislaine Maxwell		Common Interest	Communication re: legal advice	Common Interest Privilege

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DATE	DOC. TYPE	FROM	ТО	CC	RELATIONSHIP OF PARTIES	SUBJECT MATTER	PRIVILEGE
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2015.01.13	E-Mail	Philip Barden, Esq.	Martin Weinberg, Esq.		Common Interest	Communication re: legal advice	Common Interest Privilege
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2015.01.21 - 2015.01.27	E-Mails	Jeffrey Epstein	Ghislaine Maxwell		Common Interest	Communication re: legal advice	Common Interest Privilege
2015.01.21- 2015.01.27	E-Mails	Ghislaine Maxwell	Jeffrey Epstein		Common Interest	Communication re: legal advice	Common Interest Privilege