

# EXHIBIT 13

(Filed Under Seal)

**United States District Court  
Southern District of New York**

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

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**AFFIDAVIT OF VIRGINIA GIUFFRE**

I, Virginia Giuffre, swear and affirm as follows:

1. In around March 2011, I began discussions with attorney Bradley J. Edwards for the purpose of retaining him as my legal counsel. It was my understanding that I was obtaining legal services from him at that time.

2. In around March 2014, I hired attorneys Bradley J. Edwards and Paul G. Cassell to represent me on legal matters, including a Crime Victims' Rights Act (CVRA) action then pending in Florida court in Florida. They have represented me (along with other attorneys) continuously since then.

3. I have had confidential communications with Mr. Edwards and Mr. Cassell for the purpose of seeking and receiving legal advice from them. I did not intend for any of my confidential communications with them to be disclosed.

4. With regard to the defamation case known as *Edwards and Cassell v. Dershowitz*, I did not authorize Mr. Edwards and Mr. Cassell to disclose any of my confidential communications with them.

I affirm under penalty of perjury that the foregoing is true and correct.

  
Virginia Giuffre

Date: May 30th 2016