

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
VIRGINIA L. GIUFFRE,
Plaintiff,
v.
GHISLAINE MAXWELL,
Defendant.
-----X

15-cv-07433-RWS

Declaration of Martin Weinberg

I, **Martin G. Weinberg**, declare as follows:

1. I am an attorney at law duly licensed in the State of Massachusetts.
2. I have provided legal representation to **Jeffrey Epstein** as to specific past and ongoing legal matters both before and after April 2015. I regularly communicated with **Mr. Epstein** regarding my legal representation of **him** via email with the intention that such email communications remain confidential and privileged. As counsel for **Mr. Epstein**, I intended all my emails to **him** to be kept confidential, regularly marking the communications “Attorney-Client Privilege”.

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

Executed on August 17, 2016.

s/ Martin G. Weinberg
Martin G. Weinberg

CERTIFICATE OF SERVICE

I certify that on August 19, 2016, I electronically served this *Declaration of Martin G. Weinberg* via ECF on the following:

Sigrid S. McCawley
Meredith Schultz
BOIES, SCHILLER & FLEXNER, LLP
401 East Las Olas Boulevard, Ste. 1200
Ft. Lauderdale, FL 33301
smccawley@bsfllp.com
mschultz@bsfllp.com

Bradley J. Edwards
FARMER, JAFFE, WEISSING,
EDWARDS, FISTOS & LEHRMAN, P.L.
425 North Andrews Ave., Ste. 2
Ft. Lauderdale, FL 33301
brad@pathtojustice.com

Paul G. Cassell
383 S. University Street
Salt Lake City, UT 84112
cassellp@law.utah.edu

J. Stanley Pottinger
49 Twin Lakes Rd.
South Salem, NY 10590
StanPottinger@aol.com

/s/ Nicole Simmons
Nicole Simmons