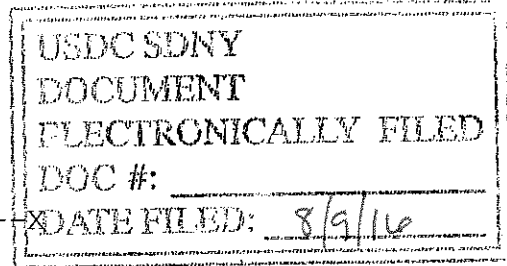


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



VIRGINIA L. GIUFFRE,

Plaintiff,

15 Civ. 7433 (RWS)

- against -

ORDER

GHISLAINE MAXWELL,

Defendant.

-----X

Sweet, D.J.

Defendant will run Plaintiff's Proposed Search Terms as set forth in Plaintiff's August 1, 2016 submission. Defendant will search all text and associated metadata set forth below.

To ensure that all relevant data is captured, Defendant will use IMAP Capable software (or a functional equivalent) to capture all of the sent/received emails from Defendant's multiple email accounts, including but not limited to (1)GMax1@ellmax.com and all other accounts to which she had access at ellemax.com; (2) gmax1@mindspring.com and other accounts to which she had access at mindspring.com; (3) any of Defendant's email accounts associated with the Terramar Project

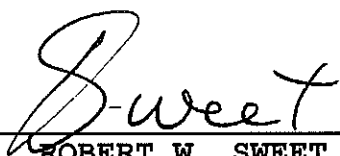
(including address @theterramarproject.org); (4) any other email accounts Defendant has used in the past or currently uses.

To capture all relevant data from electronic devices, Defendant will use FileSeek software (or a functional equivalent) to retrieve any data, including electronic documents (such as word documents, PDFs, Excel spreadsheets, etc), from Defendant's devices, including personal computers, work computers, tablets, phones, and cloud storage accounts.

Defendant will run the search terms using the wildcards and methods set forth in Plaintiff's August 1, 2016 submission. In the event the discovery software used requires different wildcards than those utilized in Plaintiff's search terms, Defendant will replace the wildcards in Plaintiff's search terms with the appropriate wildcards for the particular software utilized. Similarly, if Plaintiff's proximity search elements are not in accord with the software utilized, Defendant will replace them appropriately. Terms constituting an individual's initials must be searched to return only exact matches. Search terms must be run as non-case sensitive.

It is so ordered.

New York, NY
August 9, 2016



ROBERT W. SWEET
U.S.D.J.