

United States District Court
Southern District of New York

DOC #:
DATE FILED: 8/11/16

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE
(LETTER ROGATORY)

THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK, presents its compliments to the Foreign and Commonwealth Office, London SW1A 2AL, United Kingdom or other appropriate judicial authority and, pursuant to the Evidence (Proceedings in other Jurisdictions) Act 1975 and Part 34 of the English Civil Procedure Rules, requests international judicial assistance to issue orders of subpoena *duces tecum* to require a witness to appear for questioning and to produce documents so that evidence may be obtained for a civil proceeding in the above-captioned action which is pending before this Court.

The Plaintiff has alleged that Ms. Maxwell has defamed her, in part, through a defamatory statement issued by her press agent, Mr. Ross Gow, a resident within your jurisdiction, whose

business is located in London. Documents and testimony in the possession of Mr. Ross Gow would aid in the establishment of the facts surrounding the defamation, and justice cannot be completely done among the parties without such documents and testimony.

WE THEREFORE REQUEST that in the interests of justice you issue an order by your proper and usual process to compel the production of documents and the appearance for deposition as described below. The Court requests the assistance described herein as necessary in the interests of justice. The assistance requested is that the appropriate judicial authority of the United Kingdom compel:

- (1) The appearance of the below-named individual to provide testimony:

Mr. Ross Gow
Citizen of the United Kingdom

(business address)
Acuity Reputation
23 Berkeley Square, London
W1J 6HE

(residential address)
Flat 26, Albert Mansions
Albert Bridge Road, Battersea
London SW11 4QB

- (2) The disclosure of documents and other evidentiary items (which are understood to be in the possession of Mr. Gow).

The evidence to be produced is the following:

1. All documents concerning communications with Ghislaine Maxwell.
2. All documents concerning any statement You or Acuity Reputation made on behalf of, or concerning, Ghislaine Maxwell.
3. All documents concerning any contracts between and among You and Ghislaine Maxwell.

4. All documents concerning any contracts between Acuity Reputation and Ghislaine Maxwell.
5. All drafts of, or documents associated with, any statements You or Acuity Reputation issued or made concerning Ghislaine Maxwell.
6. All statements You or Acuity Reputation issued or made concerning Ghislaine Maxwell.
7. All documents concerning communications with Jeffrey Epstein.
8. All documents concerning communications with Alan Dershowitz.

The Appropriate Judicial Authority of United Kingdom is requested to serve the above mentioned documents by personal service into the hands of Mr. Gow or other person authorized to accept service or in a manner of service consistent with the laws of the United Kingdom.

We further request that you make Orders for the examination under oath, and for the appointment of an Examiner to oversee the examination, of the Witness at a place and time to be determined by the Examiner. Plaintiff in this case volunteers to make arrangements at her counsel's London office, located at Boies Schiller & Flexner, LLP, 25 Old Broad Street, London, England EC2N 1HQ.

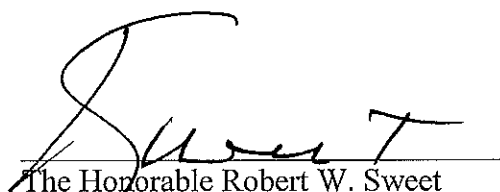
The examination of the witness and production of documents sought herein is commensurate with the laws of the United States of America, including the Federal Rules of Civil Procedure operative in this lawsuit, as are in effect for any person within the jurisdiction of this Court. It is anticipated and expected that this Court would extend the same consideration to like requests mad to this Court as sought herein, and be willing and ready to do the same thing sought herein for you, when required, for a person within our jurisdiction, consistent with due process and the law.

Plaintiff has agreed to pay and undertake to reimburse any costs and expenses associated with this Request incurred by you in executing the same, as well as the reasonable costs and expenses incurred by Mr. Gow in compliance with the Order issued by you to the extent permitted or allowed under your law and procedure, or which you otherwise deem required under the circumstances.

DATE

8-11-16

(SEAL OF COURT)



The Honorable Robert W. Sweet
United States District Judge
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
500 Pearl Street
New York, NY 10007-1312
United States of America