

# COMPOSITE EXHIBIT 1

IN THE HIGH COURT OF JUSTICE  
QUEEN'S BENCH DIVISION

Claim No. CR 2016-624

BETWEEN:

VIRGINIA L. GIUFFRE

Applicant

-and-



ROSS GOW

Respondent

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Order

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**Before Master Fontaine**

In the matter of the Evidence (Proceedings in Other Jurisdictions) Act 1975

and

In the matter of a civil proceeding now pending before the United States District Court, Southern District of New York ("**SDNY Court**") entitled as follows:-

Virginia L. Giuffre, Plaintiff, v Ghislaine Maxwell, Defendant (Case No.: 15-cv-07433-RWS)

**AN APPLICATION** was made by application notice dated 20 September 2016 for Virginia L. Giuffre (the "**Applicant**") and without a hearing.

**The Master** read the written evidence filed and the Letter Rogatory dated 11 August 2016 from the SDNY Court asking the Court for assistance in obtaining evidence, from which it appears that proceedings are pending in that court and that that court seeks to obtain the production of documents from, and appearance for deposition by, Mr. Ross Gow of Flat 26, Albert Mansions, Albert Bridge Road, Battersea, London, SW11 4QB (residential address) / Acuity Reputation, 23 Berkeley Square, London, W1J 6HE (business address).

**IT IS ORDERED** that:

1. Pursuant to section 2(2) of the Evidence (Proceedings in Other Jurisdictions) Act 1975, the Respondent, Mr. Ross Gow, attend before Mr. Rowan Planterose, who is hereby appointed examiner pursuant to CPR 34.18.1(b), at the offices of the solicitors for the Applicant or solicitors for the Respondent, to be agreed between the parties, permission to apply if not agreed, for no longer than 7 hours, at a date and time to be agreed by the Applicant and the Respondent but no later than 1 November 2016, to be examined on oath in a manner consistent with the United States Federal Rules of Civil Procedure and on the following topics of questioning:
  - a. Any professional agreements or contracts Mr. Gow had with Ms. Maxwell;
  - b. Mr. Gow's communications with Ms. Maxwell in respect of statements issued concerning Ms. Giuffre;
  - c. Any background or investigative work Mr. Gow performed in advance of issuing any statements on behalf of Ms. Maxwell concerning Ms. Giuffre, including Mr. Gow's consultation of any other individuals, including but not limited to Mr. Epstein and Mr. Dershowitz;
  - d. Mr. Gow's work crafting any statements issued on behalf of Ms. Maxwell concerning Ms. Giuffre, including his work on any preliminary drafts;
  - e. Any statements Mr. Gow issued on behalf of Ms. Maxwell concerning Ms. Giuffre;
  - f. Any other communications with the media, including responses to media inquiries, made by Mr. Gow concerning Ms. Giuffre; and
  - g. The media outlets or other recipients to which Mr. Gow issued statements on behalf of Ms. Maxwell concerning Ms. Giuffre.

and that Mr. Gow produce the following documents:

- a. All professional contracts or agreements executed by (i) Mr. Gow and/or Acuity and (ii) Ms. Maxwell between 1 January 2011 and 31 December 2015;
- b. All communications between (i) Mr. Gow and/or Acuity and (ii) Ms. Maxwell relating to the nature of Mr. Gow's engagement with Ms. Maxwell between 1 January 2011 and 31 December 2015;
- c. All (i) statements Mr. Gow and/or Acuity issued or made on behalf of Ms. Maxwell concerning Ms. Giuffre between 1 January 2011 and 31 December 2015; (ii) drafts of such statements; and (iii) documents relating to such statements or drafts thereof; and

- d. All communications between (i) Mr. Gow and/or Acuity and (ii) Mr. Epstein and/or Mr. Dershowitz concerning Ms. Giuffre between 1 January 2011 and 31 December 2015.
2. The examiner record in writing or cause to be recorded in writing the evidence of the witness Mr. Ross Gow, in a manner consistent with the United States Federal Rules of Civil Procedure relating to the examination and cross-examination of witnesses.
3. The examiner (a) request the witness to sign his deposition in the examiner's presence, (b) sign the deposition and (c) when completed, send it together with this Order and the Letter of Request to the Senior Master, Foreign Process Section, Room E02, Royal Courts of Justice, Strand, London WC2A 2LL for transmission to the court requesting the evidence of the witness.
4. Permission to the Respondent to apply to set aside, vary or stay this Order within 7 days of service of the same.
5. The Applicant's solicitors are to seal and serve this Order by no later than 7 October 2016.

Dated : 28 September 2016

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-and-



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**Memorandum for the Applicant with regards to service**

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1. By application dated 20 September 2016, Ms. Giuffre applied to the Court for an Order that the Respondent be required to attend to be deposed and produce documents for use in civil proceedings before the United States District Court, Southern District of New York in *Virginia L. Giuffre v. Ghislaine Maxwell* (Case No.: 15-cv-07433-RWS).
2. On 28 September 2016, Ms. Giuffre was informed that her application had been approved by Master Fontaine, subject to certain amendments to the draft Order which had accompanied the application.
3. On 29 September 2016, Ms. Giuffre returned the Order to the Court, with the appropriate amendments made, for issuing by the Court. Ms. Giuffre intends to serve the Order on the Respondent herself.
4. CPR Rule 34.6(1) provides that "*A witness summons is to be served by the court unless the party on whose behalf it is issued indicated in writing, when he asks the court to issue the summons, that he wishes to serve it himself.*"

5. In accordance with CPR Rule 34.6(1), Ms. Giuffre confirms that she wishes to serve the Order on the Respondent herself.

*Boies, Schiller & Flexner (UK) LLP*

**Boies Schiller & Flexner (UK) LLP**

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Partner Ref: Matthew Getz

Our Ref: 15000.0047 / DT

Doc: 224046v1

29 September 2016

Mr Ross Gow  
Acuity Reputation Ltd  
23 Berkley Square  
LONDON W1J 6HE

By email/post/personal service

Dear Mr Gow

**Re: Virginia Giuffre v Ghislaine Maxwell – Order to attend for deposition and discovery**

Please find **enclosed** by way of service an Order issued by Master Fontaine of the Queen's Bench Division requiring you to attend before Mr Rowan Planterose to be deposed and to provide documents for use in the civil proceeding pending before the United States District Court, Southern District of New York in *Virginia L. Giuffre v Ghislaine Maxwell* (Case No. 15-cv-07433-RWS).

You will note that the terms of the Order require the parties to confer and agree on:

- a. A date and time for the deposition to take place, being no later than 1 November 2016; and
- b. Whether the deposition is to take place at our offices or at the offices of your solicitor.

Matthew Getz at our firm has carriage of this matter. Please contact him as soon as possible, directly or through your solicitor, so that we may agree on the above details. He can be reached on 0207 614 0982 or at [mgetz@bsfllp.com](mailto:mgetz@bsfllp.com).

Practice Direction 34A requires Ms Giuffre to offer you, at the time of service, a sum to cover your travelling expenses to and from the court and compensation for your loss of time. On behalf of Ms Giuffre, we offer to provide you the sum of £111.50, comprising £40 for taxi fares to and from your office in London W1 to the place of deposition in London EC2, the maximum prescribed amount of £67 for loss of earnings (for more than four hours away from work) and the maximum prescribed amount of £4.50 for subsistence (for a deposition not exceeding 10 hours), as per the Guide to Allowance Under Part V of Costs in Criminal Cases (General) Regulations, June 2005.

We look forward to hearing from you.

Yours faithfully





*Boies, Schiller & Flexner (UK) LLP*

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[Encl.]

