

# **EXHIBIT C**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

VIRGINIA L. GIUFFRE,

Plaintiff,

Case No.:

-against-

15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendants.

- - - - - x

**\*\*CONFIDENTIAL\*\***

Videotaped deposition of GHISLAINE  
MAXWELL, taken pursuant to subpoena, was  
held at the law offices of BOIES  
SCHILLER & FLEXNER, 575 Lexington  
Avenue, New York, New York, commencing  
April 22, 2016, 9:04 a.m., on the above  
date, before Leslie Fagin, a Court  
Reporter and Notary Public in the State  
of New York.

- - -

MAGNA LEGAL SERVICES  
1200 Avenue of the Americas  
New York, New York 10026

1 G Maxwell - Confidential

2 A. I have every email that you asked  
3 for in discovery, that I have I gave you.

4 Q. That's not my question.

5 Did you ever delete emails in  
6 January of 2015?

7 A. I have not deleted anything that  
8 you have asked me for in discovery. I have  
9 given you everything that I have.

10 Q. That is not my question, my  
11 question is, did you ever delete emails in  
12 January of 2015?

13 A. In the normal course of my work,  
14 there are emails from spam that I delete.  
15 That is the type of email I've deleted.  
16 Anything that is material to what you want, I  
17 have not deleted.

18 Q. How do you know that?

19 A. Well, anybody that's to do with  
20 Jeffrey or [REDACTED] or women or anything of which  
21 I know you were interested in, of which I  
22 have anything I would not have done because I  
23 don't want to subject myself to...

24 Q. Have you had your computer  
25 forensically copied for purposes of this