

# **EXHIBIT C**

**From:** gmax1@ellmax.com  
**Sent:** Saturday, January 10, 2015 9:00 AM  
**To:** Philip Barden; Ross Gow

I am out of my depth to understanding defamation and other legal hazards and don't want to end up in a law suit aimed at me from anyone if I can help it. Apparently even saying Virginia is a liar has hazard! I have never been in a suit criminal or civil and want it to stay that way.

The US lawyers for the Jane Does are filling additional discovery motions and if I speak I open my self to being part of discovery apparently. I am trying to stay out of litigation and not have to employ lawyers for years as I get lost in US legal nightmare. I stand no legal risk currently on these old charges and civil suits against Jeffrey We need to consult with US lawyers on any statement I make and the complaints too

Perhaps we make a statement of the legal risk of saying anything for potential defamation or something that prevents a full and frank detailed rebuttal + the press not being the place for that? Regardless, Philip plse call jeffrey lawyer and see what you can understand from him and pehaps craft something in conjunction with him? Either way I think you need to speak to him to understand my risk so you can help me understand it - too may cooks in the kitchen and I can't make good decisions. Plse reach out to him today

+ I have already suffered such a terrible and painful loss over the last few days that I can't even see what life after press he'll even looks like - statements that don't address all just lead to more questions..what is my relationship to clinton ? Andrew on and on.

Let's rest till monday. I need head space

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From: Philip Barden  
Date: Friday, January 9, 2015 at 17:05 PM  
To: Ross Gow  
Cc: gmax  
Subject: Re: The Times - Ghislaine Maxwell

Agreed

We agreed to release a statement

We should support our friends and deny the allegations as Dershowitz urges and Prince Andrew has.

We run the real risk of guilt by silence and that is likely to feed false claims and false suits as we saw with the BBC

I advised the soldiers in Bloody Sunday not to give interviews so I am cautious and this is the time to speak.

I can say no more. I hope our advice is followed.

Philip

Sent from my iPhone

On 9 Jan 2015, at 21:53, "Ross Gow"

[REDACTED]  
wrote:

Ghislaine

I believe the next 18hrs is the best chance we have to leverage some transparency advantage on this.

MoS first then Sunday Times. Otherwise we lose any chance of ownership of the narrative.

Please give it some serious thought...

Dershowitz is out on Monday with a big push in The Times and we run the risk of looking less than gripped.

best

R

On 9 January 2015 at 20:02, Philip Barden

[REDACTED]  
I am heading home now and will call when get there

Let's not waste this moment please

Sent from my iPhone

On 9 Jan 2015, at 18:11, "Ross Gow"

[REDACTED]

Ghislainr  
further reason for us to put our side of the story out...  
best  
Ross

----- Forwarded message -----

From: Brown, David

[REDACTED]

Date: 9 January 2015 at 18:09  
Subject: The Times - Ghislaine Maxwell  
To: Ross Gow

[REDACTED]

Hi Ross  
Do keep in touch. I think were running a piece written by Professor Dershowitz on Monday.  
If Miss Maxwell wants to make a comment do let me know...  
All the best  
David Brown  
Reporter  
The Times

[REDACTED]

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Ross Gow  
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**From:** Ross Gow [REDACTED]  
**Sent:** Friday, January 09, 2015 2:54 PM  
**To:** Philip Barden  
**Cc:** G Max  
**Subject:** Re: The Times - Ghislaine Maxwell

Ghislaine

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Please give it some serious thought...

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Sent from my iPhone

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Ghislainr

further reason for us to put our side of the story out...

best

Ross

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From: Brown, David [REDACTED]  
Date: 9 January 2015 at 18:09  
Subject: The Times - Ghislaine Maxwell  
To: Ross Gow [REDACTED]

Hi Ross

Do keep in touch. I think were running a piece written by Professor Dershowitz on Monday.

If Miss Maxwell wants to make a comment do let me know...

All the best

David Brown

Reporter

The Times  
[REDACTED]



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**From:** Ross Gow [REDACTED]  
**Sent:** Monday, September 21, 2015 2:22 PM  
**To:** Gmax; Philip Barden  
**Subject:** Fwd: Question from NY Daily News  
**Attachments:** Maxwell.pdf

G  
Here we go again. VR on our case again.  
Joyous to hear I'm not a co-defendant...  
Best  
R

----- Forwarded message -----

From: "Brown, Stephen" [REDACTED]  
Date: 21 Sep 2015 20:28  
Subject: Question from NY Daily News  
To: [REDACTED]  
Cc:

Hi Ross, I'm working on a story about a defamation suit filed by Virginia Roberts against Ghislaine Maxwell.

Virginia alleges that Ghislaine defamed her by calling her claims "obvious lies," among other denials. Those denials were released through you. (To be clear, you're not named as a defendant.)

I'm wondering if Ghislaine has a response to the suit, which is attached.

Thank you,

Stephen Brown  
Manhattan Federal Court Reporter  
NY Daily News  
[REDACTED]

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