

EXHIBIT 1

G4LMGIUC

1 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

2 -----x

3 VIRGINIA L. GIUFFRE,

4 Plaintiff,

5 v.

15 Civ. 7433 (RWS)

6 GHISLAINE MAXWELL,

7 Defendant.

8 -----x

New York, N.Y.
April 21, 2016
11:05 a.m.

9
10 Before:

11 HON. ROBERT W. SWEET,

12 District Judge

13 APPEARANCES

14 BOIES, SCHILLER & FLEXNER LLP

15 Attorneys for Plaintiff

16 BY: SIGRID STONE McCAWLEY

-and-

17 FARMER, JAFFE, WEISSING, EDWARDS, FISTOS & LEHRMAN, P.L.

18 BY: BRAD EDWARDS

-and-

PAUL G. CASSELL

19 HADDON, MORGAN & FOREMAN

Attorneys for Defendant

20 BY: LAURA A. MENNINGER

JEFF PAGLUICA

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1 The plaintiff has told me that they have now supplied
2 all the education and employment records that they have. I
3 think if there is any question about that, if the defense is
4 skeptical, I would ask the counsel for the plaintiffs to make
5 that statement on the record, not necessarily here, but by way
6 of a statement to the Court and principally to the defendant.

7 On the question of residences, that's, in my view, not
8 a contention interrogatory because of the nature of this case.
9 I think it's more like listing witnesses. So I would say that
10 the plaintiff should supply all residences.

11 The Dershowitz deposition will be produced under the
12 confidentiality provision. As I read what I've been given,
13 it's to be held in confidence and it will remain in confidence,
14 but it will be produced.

15 Yes, the tax returns should be produced. 15 years
16 seems like -- I see. Ok. 15 years.

17 The medical records of the period '99 to 2002 will be
18 produced and the plaintiff will indicate whether that
19 production is complete or, if it isn't complete, when it will
20 be complete.

21 As for the pre-'99 medical records, based on where we
22 are at the moment, I do not believe that those are relevant.
23 Because the damage issue relates, in my view, solely to the
24 defamation. If that changes in any way, I will revisit that
25 issue.