

**United States District Court  
Southern District of New York**

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

---

**PLAINTIFF'S NOTICE OF RELATED ACTION IN THE UNITED KINGDOM TO  
OBTAIN THE DEPOSITION OF DEFENDANT'S PRESS AGENT, ROSS GOW**

Plaintiff, Ms. Giuffre, by and through her undersigned counsel hereby gives this Court notice of a related action, and states as follows.

For many months, Ms. Giuffre has attempted to serve process on Defendant's press agent, Ross Gow, who is a key witness in this case because he issued, on Defendant's behalf, one of the defamatory statements at issue to multiple media outlets.

Defendant's counsel, Philip Barden, is also counsel for Mr. Gow. Mr. Barden refused to accept service of process of Ms. Giuffre's Rule 45 subpoena on Mr. Gow's behalf, despite extensive correspondence with Ms. Giuffre's counsel, and her offer to take the deposition at a place and date convenient for Mr. Gow.

Ms. Giuffre has expended considerable time and money in an effort to serve process upon Mr. Gow. Ms. Giuffre served process on Mr. Gow through The Hague Convention, causing United Kingdom government agency to serve the subpoena at Mr. Gow's place of employment.

Additionally, Ms. Giuffre hired process servers in the United Kingdom who made multiple attempts to effect personal service upon Mr. Gow at both his business and residential

address.

On August 3, 2016, Ms. Giuffre applied to this Court for a Letter Rogatory in order to initiate a separate action in the United Kingdom to compel Mr. Gow to comply with the subpoena. On August 11, 2016, this Court granted Ms. Giuffre's request and issued an executed Letter Rogatory, a copy thereof is attached at Exhibit 1.

In order to initiate an action in the United Kingdom to compel Ms. Gow to comply with the subpoena, Ms. Giuffre had to retain separate counsel in the United Kingdom. Pursuant to that retention and this Court's Letter Rogatory, Ms. Giuffre initiated an action in the High Court of Justice Queen's Bench Division, in the United Kingdom, on September 22, 2016. The action in the United Kingdom requests that the High Court direct Mr. Gow to sit for his deposition pursuant to this Court's Letter Rogatory. The filed stamped copy of the Application Notice is attached at Exhibit 2.

Ms. Giuffre will keep this Court apprised of the status of the action.

September 22, 2016

Respectfully submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley  
Sigrid McCawley (Pro Hac Vice)  
Meredith Schultz (Pro Hac Vice)  
Boies, Schiller & Flexner LLP  
401 E. Las Olas Blvd., Suite 1200  
Ft. Lauderdale, FL 33301  
(954) 356-0011

David Boies  
Boies, Schiller & Flexner LLP

333 Main Street  
Armonk, NY 10504

Bradley J. Edwards (Pro Hac Vice)  
FARMER, JAFFE, WEISSING,  
EDWARDS, FISTOS & LEHRMAN, P.L.  
425 North Andrews Avenue, Suite 2  
Fort Lauderdale, Florida 33301  
(954) 524-2820

Paul G. Cassell (Pro Hac Vice)  
S.J. Quinney College of Law  
University of Utah  
383 University St.  
Salt Lake City, UT 84112  
(801) 585-5202<sup>1</sup>

---

<sup>1</sup> This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah for this private representation.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on September 22, 2016, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I also certify that the foregoing document is being served to all parties of record via transmission of the Electronic Court Filing System generated by CM/ECF.

Laura A. Menninger, Esq.  
Jeffrey Pagliuca, Esq.  
HADDON, MORGAN & FOREMAN, P.C.  
150 East 10<sup>th</sup> Avenue  
Denver, Colorado 80203  
Tel: (303) 831-7364  
Fax: (303) 832-2628  
Email: [lmenninger@hmflaw.com](mailto:lmenninger@hmflaw.com)  
[jpagliuca@hmflaw.com](mailto:jpagliuca@hmflaw.com)

/s/ Sigrid McCawley  
Sigrid S. McCawley