

**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 ORDER ISSUED BY ENGLISH COURT COMMANDING
THE DEPOSITION OF DEFENDANT’S PRESS AGENT, ROSS GOW and NOTICE OF
PERSONAL SERVICE UPON ROSS GOW**

Plaintiff, Ms. Giuffre, by and through her undersigned counsel hereby gives this Court an update concerning a related action to obtain the deposition of Defendant’s agent, Ross Gow, as described in Docket Entry 443, and provide notice that the English Court has granted Plaintiff’s application, commanding Ross Gow to sit for his deposition.

On Defendant’s behalf, Mr. Gow issued one of the defamatory statements at issue to multiple media outlets. Defendant and Mr. Gow share an attorney, Philip Barden. As the Court will recall, Mr. Barden refused to accept service of process of Ms. Giuffre’s Rule 45 Subpoena on Mr. Gow’s behalf. For many months, Ms. Giuffre attempted to serve process on Defendant’s press agent through The Hague Convention and through retention of private process servers in England. Service upon Mr. Gow through The Hague Convention was effectuated, twice, and service by the private process servers was effectuated on Mr. Gow by mail to both his residence and office. Despite service through The Hague Convention and service by mail (and email to counsel), Defendant and Mr. Gow’s attorney refused to comply with Ms. Giuffre’s Rule 45 subpoena.

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. Pursuant to 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.

On September 29, 2016, the High Court of Justice Queen's Bench Division issued an Order commanding Gow to sit for his deposition no later than November 1, 2016. *See* September 29, 2016, Order of the Senior Courts of England and Wales Foreign Process Section, attached hereto at Composite Exhibit 1.

Also on September 29, 2016, Mr. Gow was personally served at his place of business, Acuity Reputation in London, with the September 29, 2016, Court Order and a September 29, 2016, letter regarding the Order, attached hereto at Composite Exhibit 1.

Accordingly, an English Court has now commanded that Mr. Gow sit for his deposition before November 1, 2016. Further, Ms. Giuffre has effectuated personal service in compliance with the laws of the United Kingdom upon Mr. Gow.

September 29, 2016

Respectfully submitted,

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¹ 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 29, 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.

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