

# **EXHIBIT A**

H39YGIUC

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----x

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

15 CV 7433 (RWS)

GHISLAINE MAXWELL, et al.,

Defendants.

-----x

New York, N.Y.

March 9, 2017

12:20 p.m.

Before:

HON. ROBERT W. SWEET,

District Judge

APPEARANCES

STANLEY POTTINGER PLLC

Attorneys for Plaintiff

BY: STANLEY POTTINGER

S.J. QUINNEY COLLEGE OF LAW AT THE UNIVERSITY OF UTAH

Attorneys for Plaintiff

BY: PAUL G. CASSELL

HADDON MORGAN AND FOREMAN, P.C.

Attorneys for Defendant Ghislaine Maxwell

BY: LAURA A. MENNINGER

JEFFREY S. PAGLIUCA

SOUTHERN DISTRICT REPORTERS, P.C.  
(212) 805-0300

H39YGIUC

1 THE COURT: Giuffre. I was thinking the two  
2 plaintiff's motions with respect to Epstein and Barden and then  
3 the Ransome application and the Edwards application. That's  
4 what I was thinking, but I'll be guided by you all.

5 How does that sound to you, all?

6 MR. CASSELL: That sounds good, your Honor, although  
7 we had one small request on behalf of Mr. Pottinger here. He  
8 is handling the one Ransome motion. If that could be handled  
9 first, he could be returned to his office more rapidly.

10 THE COURT: Why should we be nice to him?

11 MR. POTTINGER: Other people have said that before,  
12 your Honor. It is entirely, of course, up to the Court. We'll  
13 accommodate you any way you want. Ms. Menninger has been kind  
14 enough to say -- I think I will speak for her to say she's  
15 indifferent to going first or second with this particular  
16 Ransome motion. It's entirely up to you.

17 THE COURT: Sure.

18 MS. MENNINGER: Your Honor, I did have one small  
19 concern about the Ransome motion that might foreshorten the  
20 hearing on this topic. As Your Honor is aware, at the time  
21 plaintiff filed a motion for a protective order about  
22 Ms. Ransome's discovery, I had been in the process of trying to  
23 confer with them about some discovery issues.

24 THE COURT: I think we can cut through that pretty  
25 easy by simply saying that I believe that as for any of the

SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

H39YGIUC

1 THE COURT: I understand.

2 MS. MENNINGER: Your Honor, I actually believe that  
3 these emails were some that your Honor had reviewed because we  
4 had asserted a joint defense agreement privilege, and your  
5 Honor reviewed these emails, and they were produced last April,  
6 the ones that Mr. Cassell is talking about right now.

7 THE COURT: I see. Okay.

8 MR. CASSELL: Of course it's our position that there  
9 are email accounts and things like that, as you know from our  
10 other papers, where we think -- so the fact that we have emails  
11 on January 15, 21, and 27 and they're discussing this very  
12 issue, we think a reasonable inference could be drawn by the  
13 jury, and we'll be arguing at trial that there may well be  
14 other smoking-gun emails that haven't been produced by the  
15 defendant in this case. I'm not attacking the lawyers here.  
16 I'm saying we believe there's been inadequate production, as  
17 you know from our other papers.

18 In addition, with regard to the financial information,  
19 your Honor has directed the defense to produce all of the  
20 financial information but just shortly before trial. So we  
21 haven't had an opportunity to look at, for example, the  
22 \$17,000,000 townhouse to see if there is any financial  
23 connection between Maxwell and Epstein. She's a coconspirator.  
24 We're told that the plaintiffs are somehow responsible for  
25 Epstein taking the Fifth.

SOUTHERN DISTRICT REPORTERS, P.C.  
(212) 805-0300

H39YGIUC

1 THE COURT: You just said something that I had not  
2 heard before, that you have reason to believe Epstein was  
3 involved in the townhouse?

4 MR. CASSELL: We believe that was a gift from Epstein  
5 to Ms. Maxwell. It may be a payment to keep her silent. That  
6 could be one of the arguments that would be advanced. We  
7 haven't had a chance to look at the financial information.  
8 Once we do, we'll work with it from there.

9 I think the speculation is that that was a gift from  
10 Epstein to his loyal lieutenant in exchange --

11 THE COURT: I hear you say that, but I haven't seen  
12 anything to support it.

13 MR. CASSELL: We haven't been given access to the  
14 financial records. Your Honor has said that that will be  
15 produced shortly before trial. That's why we're pursuing that  
16 line of inquiry. I don't believe I'm the only one who is  
17 speculating --

18 THE COURT: By the way, that was not stated with  
19 respect to the financial information dispute. Let's call it  
20 that. This is the first time I hear this.

21 MR. CASSELL: I can't recall whether we included that  
22 in our papers, that particular issue or not. We won the  
23 argument to get our -- our argument all along has been that  
24 financial information is appropriate to show an inner  
25 relationship.

SOUTHERN DISTRICT REPORTERS, P.C.  
(212) 805-0300

H39YGIUC

1 THE COURT: Like a number of other things in this  
2 case, it's back before me. Thanks very much.

3 MR. CASSELL: It's back before you because, I believe,  
4 once you ruled in our favor, they filed a motion to reconsider.

5 THE COURT: Be it right, wrong, or rain, it is back  
6 before me. In that briefing -- correct me if I'm wrong -- I  
7 don't think I saw any reference that Epstein was involved in  
8 any way with the house.

9 MR. CASSELL: It's been a while since I've looked at  
10 the briefing. What I recall is we have a separate heading  
11 where we say the reason we want the financial records is to  
12 show a close financial relationship between Epstein and  
13 Maxwell.

14 I know we made that argument generally. I can't  
15 recall, sitting here, whether we said and an illustration of  
16 that general point would be the townhouse. I think we provided  
17 some illustrations. I can't recall immediately whether that  
18 was one of the illustrations. We think their financial  
19 affairs --

20 THE COURT: It's not an issue.

21 MR. CASSELL: We think their financial affairs are  
22 interwoven, and of course, we will know that for sure once we  
23 get the financial production before trial.

24 THE COURT: It depends on what you get.

25 MR. CASSELL: There may be. We're, frankly,

SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

H39YGIUC

1 fearful -- as you know, we have alleged in our papers that this  
2 money is being moved offshore so that it will not be reachable  
3 in the event that Ms. Giuffre --

4 THE COURT: This I understand. That point you made.

5 MR. CASSELL: Whether Epstein is involved in that,  
6 obviously, we'll have to see what the evidence shows. We heard  
7 that somehow Mr. Epstein is taking the Fifth because we have  
8 this pro bono Crime Victims' Rights Act lawsuit going on down  
9 in Florida.

10 Mr. Epstein has criminal problems, frankly, all over  
11 the country, in the Southern District of New York, for example.  
12 So let's assume that we withdraw that lawsuit tomorrow, which  
13 we won't, he would still have criminal exposure --

14 THE COURT: Hold the phone just a second. You just  
15 said Epstein has criminal issues --

16 MR. CASSELL: Exposure.

17 THE COURT: -- in the Southern District of New York.

18 MR. CASSELL: Right.

19 THE COURT: That's the first time I hear this.

20 MR. CASSELL: Our papers have said he's running a  
21 sex-trafficking organization that included not only Florida --

22 THE COURT: Criminal. That means U.S. Attorney.

23 MR. CASSELL: I can't make any representations for  
24 what law enforcement in the Southern District of New York is  
25 doing.

SOUTHERN DISTRICT REPORTERS, P.C.  
(212) 805-0300