

EXHIBIT C

Page 1

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

VIRGINIA L. GIUFFRE,
Plaintiff,
-against-
GHISLAINE MAXWELL,
Defendant.

250 N. Australian Avenue,
Suite 1400
West Palm Beach, Florida 33401
Friday, September 9, 2016
8:35 a.m. - 2:08 p.m.

C O N F I D E N T I A L

VIDEOTAPED DEPOSITION OF JEFFREY EPSTEIN

Taken before Darline M. West,
Registered Professional Reporter, Notary Public
in and for the State of Florida At Large,
pursuant to Notice of Taking Deposition filed
by the Plaintiff in the above cause.

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24

25 (Appearances continued on the next page)

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6

7 ALSO PRESENT:

8 RYAN KICK - Video Technician
9 DARLINE MARIE WEST - Court Stenographer

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1 J. Epstein - Confidential
2 foundation.

3 THE WITNESS: Fifth.

4 BY MR. PAGLIUCA:

5 Q. In 2009, you entered into a settlement
6 agreement with Ms. Giuffre, formerly known as
7 Ms. Roberts, the Plaintiff in this case, correct?

10 THE WITNESS: Fifth.

11 MR. GOLDBERGER: And attorney-client
12 privilege. And to the extent that there's
13 an agreement that exists that's
14 confidential, we will not waive the
15 confidentiality agreement.

16 MR. PAGLIUCA: And we can have -- you
17 can have a standing objection to that on
18 those grounds related to any question I ask
19 about the settlement agreement with
20 Ms. Giuffre, if that makes it easier.

21 MR. GOLDBERGER: Yeah. That makes it
22 easier. Thank you.

23 BY MR. PAGLIUCA:

24 Q. I've not seen the settlement agreement.

25 But let me ask you if you can tell me what the terms

1 J. Epstein - Confidential
2 of that agreement are, Mr. Epstein.

3 MR. CASSELL: Object to form and
4 foundation.

5 THE WITNESS: Fifth.

6 BY MR. PAGLIUCA:

7 Q. Does the settlement agreement contain a
8 release of any claims that Ms. Giuffre had or would
9 have against you?

10 MR. CASSELL: Object to form and
11 foundation.

12 THE WITNESS: Fifth.

13 BY MR. PAGLIUCA:

14 Q. Did the settlement agreement provide for a
15 release by you of any claims against Giuffre?

16 MR. CASSELL: Form and foundation.

17 THE WITNESS: Fifth.

18 BY MR. PAGLIUCA:

19 Q. It's true, is it not, Mr. Epstein, you have
20 no economic interest in this litigation?

21 MR. CASSELL: Form and foundation.

22 Calls for a legal conclusion.

23 THE WITNESS: Fifth.

24 BY MR. PAGLIUCA:

25 Q. And by "this litigation," I mean the

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1 CERTIFICATE OF OATH

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3 STATE OF FLORIDA

4 COUNTY OF PALM BEACH

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6

7 I, the undersigned authority, certify that
8 JEFFREY EPSTEIN personally appeared before me and was
9 duly sworn on September 9, 2016.

10

11 WITNESS my hand and official seal this 13th day
12 of September 2016.

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16

DARLINE MARIE WEST

Notary Public

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19 My Commission Expires:

October 26, 2017

20 #FF 060662

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1

REPORTER'S CERTIFICATE

2

STATE OF FLORIDA

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COUNTY OF PALM BEACH

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5 I, DARLINE MARIE WEST, RPR, certify that I was
6 authorized to and did stenographically report the
7 foregoing deposition; and that the transcript is a
8 true record thereof.

9

10 I further certify that I am not a relative,
11 employee, attorney, or counsel of any of the parties,
12 nor am I a relative or employee of any of the
13 parties' attorney or counsel connected with the
14 action, nor am I financially interested in the
15 action.

16

17 Dated this 13th day of September 2016.

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DARLINE MARIE WEST, RPR

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C E R T I F I C A T E

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STATE OF FLORIDA

3

COUNTY OF PALM BEACH

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5 I, JEFFREY EPSTEIN, hereby certify that I
6 have read the foregoing transcript of my deposition
7 and that the statements contained therein, together
8 with any additions or corrections made on the
9 attached Errata Sheet, are true and correct.

10

11

12 Dated this _____ day of _____, 2016.

13

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16

JEFFREY EPSTEIN

17

18

19 The foregoing certificate was subscribed to
20 before me this _____ day of _____, 2016,
21 by the witness who has produced a
22 _____ as identification and who did
23 not take an additional oath.

24

25 _____

Notary Public

my commission expires: