

EXHIBIT C

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.

MAGNA LEGAL SERVICES
1200 Avenue of the Americas
New York, New York 10026

(866) 624-6221

1 APPEARANCES:

2 On behalf of the Plaintiff:

3 THE UNIVERSITY OF UTAH,
4 S.J. QUINNEY COLLEGE OF LAW
5 383 South University Street
6 Salt Lake City, Utah 84112
7 Phone: 801.585.5202
8 E-mail: Cassellp@law.utah.edu
9 By: PAUL G. CASSELL, ESQ.

10 -and-

11 BOIES SCHILLER & FLEXNER, LLP
12 401 East Las Olas Boulevard
13 Fort Lauderdale, Florida 33301
14 Phone: 954.356.0011
15 E-mail: Smccawley@bsfllp.com
16 By: SIGRID S. MCCAWLEY, ESQ.

17

18

19 On behalf of the Defendant:

20 HADDON MORGAN FOREMAN
21 150 East 10th Avenue
22 Denver, Colorado 80203
23 Phone: 303.831.7364
24 E-mail: Jpagliuca@hmflaw.com
25 By: JEFFREY PAGLIUCA, ESQ.

26

27 On behalf of the Witness, Jeffrey Epstein:

28 ATTERBURY GOLDBERGER & WEISS, P.A.
29 One Clearlake Centre, Suite 1400
30 250 Australian Avenue South
31 West Palm Beach, Florida 33401
32 Phone: 561.659.8300
33 E-mail: Jgoldberger@agwpa.com
34 By: JACK A. GOLDBERGER, ESQ.

35

36

37 (Appearances continued on the next page)

1 APPEARANCES:

2 MARTIN G. WEINBERG, P.C.
20 Park Plaza, No. 1000
3 Boston, Massachusetts 02116
Phone: 617.227.3700
4 E-mail: Marty@martinweinberglaw.com
By: MARTIN G. WEINBERG, P.C.,
5 (Appearing telephonically)
6

7 ALSO PRESENT:

8 RYAN KICK - Video Technician
9 DARLINE MARIE WEST - Court Stenographer
10

- - -

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

I N D E X

WITNESS:	PAGE:
JEFFREY EDWARD EPSTEIN	
DIRECT EXAMINATION	8
BY MR. CASSELL:	
CROSS-EXAMINATION	275
BY MR. PAGLIUCA:	
REDIRECT EXAMINATION	324
BY MR. CASSELL:	
CERTIFICATE OF OATH	375
REPORTER'S CERTIFICATE	376

- - -

E X H I B I T S

- - -

	Description	Page
Plaintiff's Exhibit JE1	Transcript of the deposition of Ms. Maxwell taken on April 22nd, 2016	54
Plaintiff's Exhibit JE2	Document with titles of books	90
Plaintiff's Exhibit JE3	Photograph depicting Prince Andrew, Maxwell, and Virginia	101
Plaintiff's Exhibit JE4	E-mail that Jeffrey Epstein sent to Maxwell on January 12th, 2015	173

1	Plaintiff's Composite Exhibit JE5	E-mail Jeffrey Epstein received from Ms. Maxwell on about July 18th, 2009	180
2			
3	Plaintiff's Exhibit JE6	E-mail string between Jeffrey Epstein and Ms. Maxwell on about March 25th, 2011	185
4			
5	Plaintiff's Exhibit JE7	Transcription of a string of e-mails between Jeffrey Epstein and Ms. Maxwell in about May of 2011	189
6			
7			
8	Plaintiff's Exhibit JE8	E-mail that Jeffrey Epstein sent to Maxwell on January 15th, 2015	191
9			
10	Plaintiff's Exhibit JE9	Document 361-46 on the public record in the case Jane Doe versus United States 908CD80736 in the Southern District of Florida, a document signed by Gerald Lefcourt and Alan Dershowitz	210
11			
12			
13			
14			
15			
16			
17	Plaintiff's Exhibit JE10	Subpoena in this case for Jeffrey Epstein to appear at deposition	225
18			
19	Plaintiff's Exhibit JE11	Transcript of Ms. Maxwell, taken on July 22, 2016	347
20			
21			
22			
23			
24			
25			

1 QUESTIONS MARKED BY THE REQUEST OF COUNSEL:

2

PAGE/LINES

3

Page 69, lines 24 through 25

4

Page 70, lines 2 thorough 16

(At the request of Mr. Pagliuca)

5

6

Page 280, lines 4 through 6

(At the request of Mr. Cassell)

7

8

- - -

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

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?

8 MR. CASSELL: Object to form and
9 foundation.

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

CERTIFICATE OF OATH

STATE OF FLORIDA

COUNTY OF PALM BEACH

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

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

DARLINE MARIE WEST

Notary Public

My Commission Expires:

October 26, 2017

#FF 060662

REPORTER'S CERTIFICATE

STATE OF FLORIDA

COUNTY OF PALM BEACH

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

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

Dated this 13th day of September 2016.

DARLINE MARIE WEST, RPR

C E R T I F I C A T E

STATE OF FLORIDA

COUNTY OF PALM BEACH

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

Dated this _____ day of _____, 2016.

JEFFREY EPSTEIN

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

Notary Public

my commission expires: