

EXHIBIT 1

BOIES, SCHILLER & FLEXNER LLP

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March 22, 2016

Via Electronic Mail

Laura A. Menninger, Esq.
 HADDON, MORGAN & FOREMAN, P.C.
 150 East 10th Avenue
 Denver, Colorado 80203

**Re: *Giuffre v. Maxwell*,
Case no. 15-cv-07433-RWS**

Dear Ms. Menninger:

Pursuant to last Thursday's hearing before Judge Sweet and my agreement to provide the Defendant with the exhibits that I may use at this Friday's deposition of the Defendant, below please find a list of the exhibits that we may rely upon.

DESCRIPTION	BATES
September 21, 2015 Complaint [DE 1] filed in Maxwell defamation action	Giuffre002981-002992
Defendant's Answer [DE 54] to Complaint dated March 14, 2016	
March 18, 2016 Protective Order [DE 62] filed in Maxwell defamation action	
March 17, 2011 FBI 302 Interview of Virginia Giuffre (in Australia)	Giuffre001235-001246
February 22, 2016 Re-Notice of Taking Videotaped Deposition of Ghislaine Maxwell - (March 25, 2016)	
February 5, 2016 Notice of Taking Videotaped Deposition of Ghislaine Maxwell - (March 2, 2016)	
Defendant Maxwell's Rule 26 Disclosures dated February 24, 2016	
Defendant Maxwell's Privilege Log	
Defendant Maxwell's February 8, 2016 document production	GM_00001-00015
Defendant Maxwell's February 29, 2016 Rule 26 Disclosure documents	GM_00016-00068
2009 Notice of Taking Videotaped Deposition of Ghislaine Maxwell, Subpoena and Daily Mail article	Exhibit 8 to Plaintiff's Motion to Compel Production of Documents Subject to Improper Objections [DE 25]
March 9, 2011 Ross Gow Statement	Giuffre001067

Letter to Laura Menninger, Esq.

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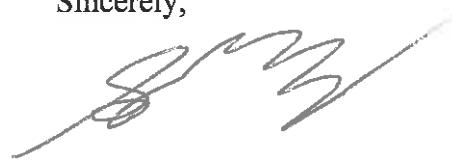
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DESCRIPTION	BATES
January 4, 2015 Express Article: "Ghislaine Maxwell I was Not a Madam for Paedophile"	Plaintiff's Rule 26 Disclosures
January 5, 2015 New York Daily News Article: "Alleged Madam Accused of Supplying Prince Andrew with Underage Teen For Sex Spotted In NYC - As He's Seen Cutting Swiss Vacation Short To Face Queen"	Giuffre001120
Flight Logs	Giuffre000721-000859
Message Pads	Giuffre001387-001571
West Palm Beach Detective Report	Giuffre000002-000089
Rodriguez Journal aka Black Book	Giuffre001573-001669
Complaint in Jane Doe v. Epstein action	Giuffre001207-001233
September 3, 2008 Victim Notification Letter	Giuffre001203-001205
January 21, 2015 Declaration of Jane Doe No. 3 aka Virginia Giuffre in CVRA action	Giuffre000888-000906
February 6, 2015 Declaration of Jane Doe No. 3 aka Virginia Giuffre in CVRA action	Giuffre000907-000934
November 20, 2015 Declaration of Virginia Giuffre in Dershowitz action	Giuffre000383-000398
February 1, 2015 Mirror Article "Prince Andrew's Pal Ghislaine Maxwell May Sue Over Madam Allegations	Giuffre001125-001128
January 3, 2015 Daily Mail Article: "Harvard Law Professor Named Alongside Prince Andrew in Sex-Slave Case Accuses Alleged Victim of Making Up Stories	Giuffre001088-001099
September 23, 2007 Red Ice Creations Article: "Prince Andrew's Friend, Ghislaine Maxwell, Some Underage Girls And a Very Disturbing Story	Giuffre001131-001138
Photographs	Giuffre000404-000424
Thailand Flight Information and Invoices for VR	Giuffre000375-381 and Giuffre000919-926
November 21, 2005 Statement of Juan Alessi	Giuffre000598-623
March 24, 2010 Deposition Transcript of Sarah Kellen	Plaintiff's Revised Rule 26 Disclosures
April 13, 2010 Deposition Transcript of Nadia Marcinkova	Giuffre001164-001201
July 29, 2009 Deposition Transcript of Alfredo Rodriguez	Giuffre000252-000318
August 7, 2009 Continued Deposition Transcript of Alfredo Rodriguez	Giuffre001005-001057
September 8, 2009 Deposition Transcript of Juan Alessi	Giuffre000091-000249
Medical Records produced March 22, 2016	

B O N E S S C H I L L E R & F L E X N E R L L P

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Sincerely,



Sigrid S. McCawley, Esq.

SSM/ep