

## EXHIBIT E

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendant.

-----X

**AFFIDAVIT OF GHISLAINE MAXWELL**

I, Ghislaine Maxwell, swear and affirm as follows:

1. On March 4, 2011, I hired Philip Barden of Devonshires Solicitors in London, England to represent me with respect to legal matters in England & Wales. He has represented me continuously since that time.

2. I sought and received legal advice from Mr. Barden concerning my rights in the United Kingdom to pursue defamation claims. I never sought or received business advice from Mr. Barden.

3. Mr. Barden's legal advice to me concerned matters of English law. To my knowledge, he is not admitted to practice law in the United States.

4. My communications with Mr. Barden were made for the purpose of receiving legal advice from him. I expected that my communications with Mr. Barden would remain confidential.

5. On March 10, 2011, Mr. Barden issued a cease and desist statement to the British press concerning Virginia Roberts' false allegations about me and fabrication of events published in the British press. That cease and desist statement is attached hereto as Exhibit A.

6. At the same time I hired Mr. Barden, I hired Ross Gow to act as my agent. As my agent, my communications with Mr. Barden to which Mr. Gow was privy are covered by attorney-client privilege in the United Kingdom as well as my contract with Mr. Barden.

7. Mr. Gow issued a statement to the British Press on my behalf on January 2, 2015. That statement is attached hereto as Exhibit B.

8. I did not issue any statement thereafter concerning or relating to Virginia Roberts or the matters alleged by her, either in the British press or elsewhere.

9. In 2009, I hired Brett Jaffe of Cohen & Gesser LLP to represent me in connection with a deposition notice and related matters in the United States.

10. Mr. Jaffe represented me for several years.

11. At some point, Mr. Jaffe left Cohen & Gesser, LLP. After he left, Mark Cohen, also of Cohen & Gesser, LLP, continued as my legal counsel.

12. My communications with Mr. Jaffe and Mr. Cohen were made for the purpose of receiving and soliciting legal advice from them.


13. I expected that my communications with Mr. Jaffe and Mr. Cohen would remain confidential.

14. I understand attorney Martin Weinberg to be acting as an attorney for Mr. Jeffrey Epstein. That representation has spanned several years, including 2015.

15. I understand that Alan Dershowitz also represented Mr. Jeffrey Epstein for many years.

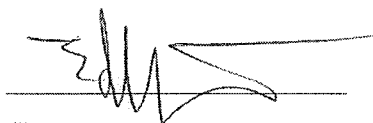
16. I understood that my communications to Mr. Epstein concerning legal advice were to be confidential as pursuant to a common interest agreement between us and our respective counsel.

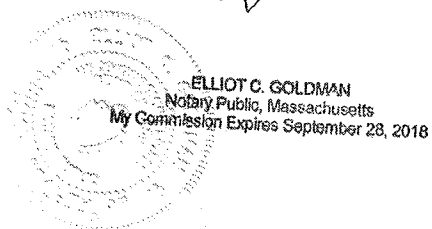
I affirm under penalty of perjury that the foregoing is true and correct.

  
\_\_\_\_\_  
Ghislaine Maxwell

STATE OF MA )  
COUNTY OF Suffolk )

Subscribed and sworn to me, this 7th day of March, 2016 by Ghislaine Maxwell.

  
\_\_\_\_\_



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## Statement on Behalf of Ghislaine Maxwell

BY DEVONSHIRES SOLICITORS, PRNE  
WEDNESDAY, MARCH 9, 2011

LONDON, March 10, 2011 - Ghislaine Maxwell denies the various allegations about her that have appeared recently in the media. These allegations are all entirely false.

It is unacceptable that letters sent by Ms Maxwell's legal representatives to certain newspapers pointing out the truth and asking for the allegations to be withdrawn have simply been ignored.

In the circumstances, Ms Maxwell is now proceeding to take legal action against those newspapers.

"I understand newspapers need stories to sell copies. It is well known that certain newspapers live by the adage, "why let the truth get in the way of a good story." However, the allegations made against me are abhorrent and entirely untrue and I ask that they stop," said Ghislaine Maxwell.

"A number of newspapers have shown a complete lack of accuracy in their reporting of this story and a failure to carry out the most elementary investigation or any real due diligence. I am now taking action to clear my name," she said.

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Filed under: Government and Policy, Law, Media

Tags: Devonshires Solicitors, London, March 10, United Kingdom

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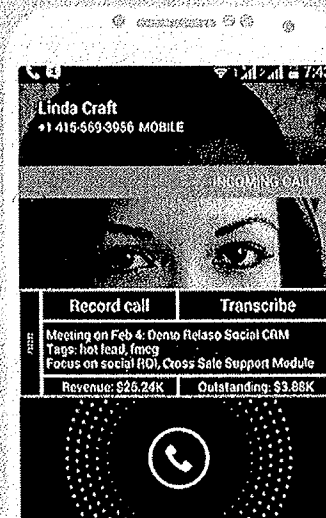
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20	21	22	23	24	25	26
27	28	1	2	3	4	5
6	7	8	9	10	11	12

Exhibit A

From: <[ross@acuityreputation.com](mailto:ross@acuityreputation.com)>  
Date: 2 January 2015 at 20:38  
Subject: Ghislaine Maxwell  
To: Rossacuity Gow <[ross@acuityreputation.com](mailto:ross@acuityreputation.com)>  
bcc: [martin.robinson@mailonline.co.uk](mailto:martin.robinson@mailonline.co.uk),  
[P.Peachey@independent.co.uk](mailto:P.Peachey@independent.co.uk),  
[nick.sommerlad@mirror.co.uk](mailto:nick.sommerlad@mirror.co.uk),  
[david.brown@thetimes.co.uk](mailto:david.brown@thetimes.co.uk),  
[nick.alway@bbc.co.uk](mailto:nick.alway@bbc.co.uk),  
[jo-anne.pugh@bbc.co.uk](mailto:jo-anne.pugh@bbc.co.uk)

To Whom It May Concern,  
Please find attached a quotable statement on behalf of Ms Maxwell.

No further communication will be provided by her on this matter.  
Thanks for your understanding.  
Best  
Ross

Ross Gow  
ACUITY Reputation

Jane Doe 3 is Virginia Roberts - so not a new individual. The allegations made by Victoria Roberts against Ghislaine Maxwell are untrue. The original allegations are not new and have been fully responded to and shown to be untrue.

Each time the story is re told it changes with new salacious details about public figures and world leaders and now it is alleged by Ms Roberts that Alan Dershowitz is involved in having sexual relations with her, which he denies.

Ms Roberts claims are obvious lies and should be treated as such and not publicised as news, as they are defamatory.

Ghislaine Maxwell's original response to the lies and defamatory claims remains the same. Maxwell strongly denies allegations of an unsavoury nature, which have appeared in the British press and elsewhere and reserves her right to seek redress at the repetition of such old defamatory claims.

Sent from my BlackBerry® wireless device

Exhibit B

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