

# EXHIBIT 2

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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VIRGINIA L. GIUFFRE,

Plaintiff,

Case No.:

-against-

15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendants.

- - - - - X

**\*\*CONFIDENTIAL\*\***

Videotaped deposition of GHISLAINE  
MAXWELL, taken pursuant to subpoena, was  
held at the law offices of BOIES  
SCHILLER & FLEXNER, 575 Lexington  
Avenue, New York, New York, commencing  
April 22, 2016, 9:04 a.m., on the above  
date, before Leslie Fagin, a Court  
Reporter and Notary Public in the State  
of New York.

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

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APPEARANCES:

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BY: JEFFREY S. PAGLIUCA, ESQUIRE  
LAURA A. MENNINGER, ESQUIRE

Also Present:  
James Christe, videographer

1           G Maxwell - Confidential  
2       absolutely everything that took place in that  
3       first meeting. She has lied repeatedly,  
4       often and is just an awful fantasist. So  
5       very difficult for anything to take place  
6       that she repeated because I was with her  
7       mother the entire time.

8           Q.    So did you have -- did you give a  
9       massage with Virginia Roberts and Mr. Epstein  
10      during the first time Virginia Roberts was at  
11      the West Palm Beach house?

12           MR. PAGLIUCA: Object to the form  
13      and foundation.

14           Q.    Yes or no?

15           A.    No.

16           Q.    Have you ever given a massage with  
17      Virginia Roberts in the room and Jeffrey  
18      Epstein?

19           MR. PAGLIUCA: Object to the form  
20      and foundation.

21           A.    No.

22           Q.    Have you ever given Jeffrey Epstein  
23      a massage?

24           MR. PAGLIUCA: Object to the form,  
25      foundation. And I'm going to instruct

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2 you not to answer that question. I  
3 don't have any problem with you asking  
4 questions about what the subject matter  
5 of this lawsuit is, which would be, as  
6 you've termed it, sexual trafficking of  
7 Ms. Roberts.

8 To the extent you are asking for  
9 information relating to any consensual  
10 adult interaction between my client and  
11 Mr. Epstein, I'm going to instruct her  
12 not to answer because it's not part of  
13 this litigation and it is her private  
14 confidential information, not subject to  
15 this deposition.

16 MS. McCAWLEY: You can instruct her  
17 not to answer. That is your right. But  
18 I will bring her back for another  
19 deposition because it is part of the  
20 subject matter of this litigation so she  
21 should be answering these questions.  
22 This is civil litigation, deposition and  
23 she should be responsible for answering  
24 these questions.

25 MR. PAGLIUCA: I disagree and you

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2 understand the bounds that I put on it.

3 MS. McCAWLEY: No, I don't. I will  
4 continue to ask my questions and you can  
5 continue to make your objections.

6 Q. Did you ever participate from the  
7 time period of 1992 to 2009, did you ever  
8 participate in a massage with Jeffrey Epstein  
9 and another female?

10 MR. PAGLIUCA: Objection. Do not  
11 answer that question. Again, to the  
12 extent you are asking for some sort of  
13 illegal activity as you've construed in  
14 connection with this case I don't have  
15 any problem with you asking that  
16 question. To the extent these questions  
17 involve consensual acts between adults,  
18 frankly, they're none of your business  
19 and I will instruct the witness not to  
20 answer.

21 MS. McCAWLEY: This case involves  
22 sexual trafficking, sexual abuse,  
23 questions about her having interactions  
24 with other females is relevant to this  
25 case. She needs to answer these

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2 questions.

3 MR. PAGLIUCA: I'm instructing her  
4 not to answer.

5 MS. McCAWLEY: Then we will be back  
6 here again.

7 Q. Have you ever given a massage to  
8 Mr. Epstein with a female that was under the  
9 age of 18?

10 A. Can you repeat the question?

11 Q. Yes. Have you ever given a massage  
12 to Mr. Epstein with a female that was under  
13 the age of 18?

14 A. No.

15 Q. Have you ever observed Mr. Epstein  
16 having a massage given by an individual, a  
17 female, who was under the age of 18?

18 A. No.

19 Q. Have you ever observed females  
20 under the age of 18 in the presence of  
21 Jeffrey Epstein at his home?

22 MR. PAGLIUCA: Object to the form  
23 and foundation.

24 A. Again, I have friends that have  
25 children --