

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
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New York, New York 10026

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APPEARANCES:

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LAURA A. MENNINGER, ESQUIRE

Also Present:
James Christe, videographer

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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 --