

EXHIBIT A

EMERY CELLI BRINCKERHOFF & ABADY LLP

RICHARD D. EMERY
ANDREW G. CELLI, JR.
MATTHEW D. BRINCKERHOFF
JONATHAN S. ABADY
EARL S. WARD
ILANN M. MAAZEL
HAL R. LIEBERMAN
DANIEL J. KORNSTEIN
O. ANDREW F. WILSON
ELIZABETH S. SAYLOR
DEBRA L. GREENBERGER
ZOE SALZMAN
SAM SHAPIRO
ALISON FRICK
DAVID LEBOWITZ
HAYLEY HOROWITZ
DOUGLAS E. LIEB
ALANNA KAUFMAN
JESSICA CLARKE
EMMA L. FREEMAN

ATTORNEYS AT LAW
600 FIFTH AVENUE AT ROCKEFELLER CENTER
10TH FLOOR
NEW YORK, NEW YORK 10020

TELEPHONE
(212) 763-5000
FACSIMILE
(212) 763-5001
WEB ADDRESS
www.ecbalaw.com

CHARLES J. OGLETREE, JR.
DIANE L. HOUK

FILED UNDER SEAL

June 21, 2017

By ECF

Honorable Robert W. Sweet
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Giuffre v. Maxwell, No. 15 Civ. 7433 (RWS)

Dear Judge Sweet:

This firm represents Intervenor Professor Alan M. Dershowitz, and we write in anticipation of the parties' forthcoming motion practice concerning the confidentiality of the Sarah Ransome deposition.¹ Intervenor requests that, if the Court allows Plaintiff Virginia Giuffre to remove the confidentiality designation concerning the Ransome deposition—an action that would require modification of the Protective Order in this case—it also simultaneously remove the confidentiality designation from several related emails and attachments that the parties previously designated confidential (RANSOME_000273-557) (“the Emails”). The Emails will demonstrate that Ms. Ransome’s inflammatory, salacious, and defamatory testimony concerning the Intervenor and others is false and that the deponent is not credible. Absent this relief, Ms. Ransome’s un rebutted testimony will gravely prejudice Intervenor by publishing deliberate lies calculated to harm his reputation. Counsel for Ms. Giuffre has not indicated whether she consents to removing the confidentiality designation from the Emails; and counsel has indicated that Ms. Giuffre “is not sure” whether she will seek to remove the confidentiality designation from the Ransome deposition, notwithstanding her prior letter requesting that relief

¹ Intervenor Dershowitz respectfully submits that issues concerning the confidentiality of particular materials under the protective order are not mooted by the settlement of the underlying action. *See Gambale v. Deutsche Bank AG*, 377 F.3d 133, 140-41 (2d Cir. 2004).

EMERY CELLI BRINCKERHOFF & ABADY LLP

Page 2

privately. Nevertheless, we write in an abundance of caution and to avoid the risk of a de-contextualized and one-sided disclosure.

In a letter from her counsel Boise Shiller Flexner LLP to Laura Menninger on May 5, 2017, Ms. Giuffre purported to give notice of her “withdrawal of her confidentiality designation of Ms. Ransome’s deposition transcript in its entirety.” We understand Ms. Maxwell will move to oppose this de-designation.

If the Court allows Ms. Giuffre to remove the confidentiality designation from the Ransome deposition, the Emails should be disclosed at the same time to allow the public to understand the full context of Ms. Ransome’s testimony, and to assess the credibility (or lack thereof) of Ms. Ransome. Ms. Giuffre should not be permitted to use this Court’s power to make a false and heinous public accusation against Intervenor (like the publicly filed false affidavits in prior litigation concerning Intervenor) and then shield from disclosure all proof that the accusation is perjurious (as she has done previously in this case by designating her book manuscript and emails to the press, which show her claims against Intervenor to be false, as confidential).

Intervenor seeks the de-designation of the Emails to challenge Ms. Ransome’s false and defamatory accusations that, among other things, she had sexual intercourse with Intervenor when she was twenty-three. Ms. Ransome’s allegations concerning Intervenor are categorically false. Prof. Dershowitz has never met or had contact with Ms. Ransome, was not her lawyer, and certainly never had a sexual encounter with her. Prior to this action, Intervenor had never heard of Ms. Ransome. Her testimony was fabricated from whole cloth. Ms. Ransome’s testimony also contains a slew of other incendiary claims concerning the sexual proclivities of [REDACTED], [REDACTED], and other prominent individuals.

The Emails are a necessary antidote to Ms. Ransome’s deposition misstatements because they demonstrate she manifestly lacks credibility. For example, she writes:

- “My emails have been hacked. I have reached out to the Russians for help and they are coming to my aid. Thank goodness for Anonymous!!!! I will make sure that they all go behind bars. I have already sent everything I need to so, the CIA, hacking my emails etc were too late. I also have numerous devices, with systems that are unhackable and I have film footage all over Europe itching to be released.” Ex. 1 (RANSOME_000521);
- Her friend was “[REDACTED]” Ex. 2 (RANSOME_000295);
- “I will make sure that neither that [REDACTED] [REDACTED]. I will also make sure that everyone on the God damn planet see’s [sic] that footage and photo’s [sic] and will release them to Wiki leaks by Sunday. I will take down Epstein and his bunch of fuck wit cronies myself!!!!!!!!!! I have also gone to a Russian news paper.” Ex. 3 (RANSOME_000368);

EMERY CELLI BRINCKERHOFF & ABADY LLP

Page 3

- “[REDACTED] must pay for what they did to us as must the rest of the men that were involved in their seedy inner circle.” Ex. 4 (RANSOME_000284);
- “[M]y friend had sexual intercourse with [REDACTED] sex tapes were in fact filmed on each separate occasion ... I eventually managed to persuade her to send me some of the video footage which she kept, implicating all three all men ... I have backed up the footage on several USB sticks and have securely sent them to various different locations throughout Europe.” Ex. 5 (RANSOME_000295);
- “[A]nother friend ... was one of the many girls that had sexual relations with [REDACTED] ... She confided in me about her casual ‘friendship’ with [REDACTED] [REDACTED] definitely seemed to have a thing for her and she told me how he kept going on about how he liked her ‘pert nipples’. [REDACTED] liked flicking and sucking her nipples until they were raw. One evening when we were showering together she showed me her nipples. They looked incredibly painful as they were red and swollen and I remember wincing when I looked at them. I also know she had sexual relations with [REDACTED] at Jeffery’s NY mansion on regular occasions as I once met [REDACTED] for coffee, just before she was going to meet [REDACTED] and Epstein together at his mansion.” Ex. 6 (RANSOME_000296);

Importantly, the Emails, which fatally undermine Ms. Ransome’s credibility, were not available to Ms. Maxwell’s counsel when she examined Ms. Ransome in the deposition in this case. For this reason, the deposition transcript standing alone leaves an incomplete and, thus, false impression of Ms. Ransome and her outrageous claims.

This Court should not allow its power to enter and modify a protective order to be manipulated so as to authorize selective disclosure of de-contextualized materials. If the Ransome deposition is made public, the Emails must also be as well.

Respectfully submitted,



Andrew G. Celli, Jr.

c: Counsel for Plaintiff and Defendant (by Email)

Exhibit 1

CONFIDENTIAL

From: Sarah Ransome
To: [REDACTED]
Subject: Re: Our talk -
Date: Sunday, October 23, 2016 3:52:09 AM

Dear Maureen,

I have spoken to my family at some length this morning and I would like to retract everything I have said to you and walk away from this.

I shouldn't have contacted you and I'm sorry I wasted your time. It's not worth coming forward and I will never be heard anyhow and only bad things will happen as a consequence of me going public and I know this to be true. This will just create pain for my family and I and they have already helped me pick up the pieces once before and I can't ask them to do that again.

I'm disappointed that you have made little contact or didn't do anything to help me this week as it been a little terrifying for [REDACTED] and myself but I understand your stance and we managed to get through it. Prehaps if I was in your position I would have done the same?

I guess one person can't make a difference.

I wish you the best of luck on catching Epstein and company.

Regards

Sarah

From: Sarah Ransome <[REDACTED]>
To: Sarah Ransome [REDACTED]
Subject: Re: Our talk -
Sent: Sat, Oct 22, 2016 4:52:41 PM

Maureen,

My emails been hacked. I have reached out to the Russians for help and they are coming to my aid. Thank goodness for Anonymous!!!!

I will make sure that they all go behind bars. I have already sent everything I need to so, the CIA, hacking my emails etc were too late.

I also have numerous devices, with systems that are unhackable and I have film footage all over Europe itching to be released.

Thanks again for your help. You really took one for the team. Nice! I hope you go to sleep at night wondering just quite where you will end up after this life is finished. Don't believe me? I can prove that too. You don't know who I am and I am not going to go away until I have achieved my goals on getting the bad guys where they belong.

RANSOME 000521

Exhibit 2

CONFIDENTIAL

whilst he spanked his penis on her bottom.

She also had to have sexual intercourse with [REDACTED] in Epstein's New York Mansion just off 5th Avenue on numerous occasions. It's the NY Mansion we spoke about yesterday. I too was forced by Epstein to visit regularly and if I didn't turn up he would personally come and find me where ever I was hiding. It still bewilders me how Epstein always seemed to know where I was if I didn't turn up at his NY residence.

When my friend had sexual intercourse with [REDACTED] [REDACTED] and [REDACTED], sex tapes were in fact filmed on each separate occasion by Jeffery. Thank God she managed to get a hold of some footage of the filmed sex tapes, which clearly identify the faces of [REDACTED] [REDACTED] [REDACTED] and [REDACTED] having sexual intercourse with her. Frustratingly enough Epstein was not seen in any of the footage but he was clever like that!

After two hours of trying to convince my friend to come forward with me, I eventually managed to persuade her to send me some of the video footage which she kept, implicating all three all men mentioned above. I personally can confirm that I have, with my own two eyes, seen the evidence of these sexual acts, which clearly identifies [REDACTED], [REDACTED], [REDACTED] having sexual intercourse with my friend. I will be more then willing to swear under oath and testify in court over these sex tapes. It will break your heart into a million tiny pieces Maureen when you watch this footage, and I know that what I watched yesterday, will haunt me for the rest of my life!

Unfortunately, I cannot send you the footage without her consent due to massive consequences to her safety but I can confirm that I do have footage in my possession. I have backed up the footage on several USB sticks and have securely sent them to various different locations throughout Europe with only one other person close to me, knowing where their locations are, just in case anything happens to me before the footage is released.

When my friend eventually had the courage to speak out and went to the police in 2008 to report what had happened, nothing was done and she was utterly humiliated by the police department where she went to report what had happened with Epstein, [REDACTED] [REDACTED] and [REDACTED]. She was made to feel like a dirty whore and a liar and wasn't taken seriously. When she then tried to sue Epstein for damages, she was severely bullied and threatened by his lawyer Alan Dershowitz whom she also had sexual relations with and who was also heavily involved in Epstein's paedophile Ring.

A couple months later, she was then approached, [REDACTED] [REDACTED]. They heavily intimidated her, ruffled her up (luckily she took photos as evidence) and was then forced to sign a confidentiality agreement which ensures that she can never come forward publicly implicating [REDACTED] [REDACTED]

She was then given a substantial payout, directly from [REDACTED] to keep her quiet. She is 1000% certain that the FBI did a cover up and she has the individual names of [REDACTED] [REDACTED] involved in intimidating her. She was then forced against her will to sign a legally binding confidentiality agreement on [REDACTED] behalf for her eternal silence. If she breaks this agreement, she is dead.

She told me how it was a complete conspiracy as Alan Dershowitz, whom was one of the lawyers that represented Jeffery when he went to trial, [REDACTED] [REDACTED]

I personally met Alan numerous times as Jeffery had sent him to my legal aid, to deal with a case I was going to open against [REDACTED] [REDACTED] whom I met through the website SugarDaddie.com (he went under the name [REDACTED] on the site). [REDACTED] also tried to rape me with his friend when we were at anchor on his boat in Miami.

Exhibit 3

CONFIDENTIAL

I'm stronger then that and mark my words I will take them and you down with me if you do not publish my story!!!!!!!!!!!!

* I have already corresponded with the Moscow police and aid them in stopping [REDACTED] or [REDACTED] getting through.

*I will film my own interview on this subject and post it on every single one of my social media apps and ask everybody to share it!!! (I have lived all over the world some I have quite a big little black book of my own!

I have also emailed Wiki Leaks and Anonymous, because my voice will be heard if it's the last thing I do!!!

I will not stand by and let anyone else be hurt and I want those bastards to see my face when I was in my coma. That was a result of the trauma they put me through. No one else will suffer, do you understand me!!!!!! I thought you were on our side!

You have really annoyed the wrong person and I am done being nice to anyone anymore.

So there you have your God damn headline, I'm taking the world to Ransom and taking down all the evil people with or without your help!

Sarah

From: Sarah Ransome [REDACTED]
To: Maureen Callahan [REDACTED];
Subject: Re: Our talk -
Sent: Fri, Oct 21, 2016 11:23:08 AM

Maureen,

Seeming as MY and my fiancé's life is in danger and nothing has been done!!!! Even though I have every bit of evidence to implicate all parties mentioned.

Mark my words, I will make sure that neither that [REDACTED] [REDACTED]. I will also make sure that everyone on the God damn planet see's that footage and photo's and will release them to Wiki leaks by Sunday. I will take down Epstein and his bunch of fuck wit cronies myself!!!!!!!!!!!!

I have also gone to a Russian news paper.

Seeming as the US Goverment won't help me surprise surprise, I will help myself..... just like I always have!!!!

You've just lost your exclusive and I AM SUPER FUCKED OFF NOW!!!!

I feel so strongly about taking down these evil cunts, that even if you offered me enough money to buy the biggest Super Yacht in the world, which would give me the ability to hire and then fire all the people that where dicks to me, when I worked in the industry, I will still not diaviate from my goal.

RANSOME 000368

Exhibit 4

CONFIDENTIAL

Thu, Oct 13, 2016 5:43:06 PM

Hi Sarah,

No need to apologize at all. I'm with you -- the more girls who can come forward the better. We're in a new climate now -- it's the victimizers who should be scared, not the victims.

Send me the best number to call you at, and we'll talk next week. Thanks to you for reaching out.

Sincerely,
M

On Thu, Oct 13, 2016 at 1:27 PM, Sarah Ransome

[REDACTED] > wrote:

That's great. We need to get the other girls to come forward Maureen as they are all be afraid. I however am not intimidated and need your help. These men destroyed my life.

I apologize for my heated first email to you however when I came across your acticle in the NYC Post, how that happened I don't know and everything came flooding back. I would never dream of contacting anyone about this but something made me reach out to you.

What they did was wrong and I have spent the last 10 years trying to forget what happened on that Island. There are more girls Maureen. More then you can ever imagine. They're scared and so am I but Jeffery, [REDACTED] and [REDACTED] must pay for what they did to us as must the rest of the men that were involved in their seedy inner circle. We have to get the rest of the girls to come forward somehow?

I look forward to you your call and thank you for taking the time to listen to me.

Kind Regards

Sarah

RANSOME 000284

Exhibit 5

CONFIDENTIAL

whilst he spanked his penis on her bottom.

She also had to have sexual intercourse with [REDACTED] in Epstein's New York Mansion just off 5th Avenue on numerous occasions. It's the NY Mansion we spoke about yesterday. I too was forced by Epstein to visit regularly and if I didn't turn up he would personally come and find me where ever I was hiding. It still bewilders me how Epstein always seemed to know where I was if I didn't turn up at his NY residence.

When my friend had sexual intercourse with [REDACTED] [REDACTED] and [REDACTED], sex tapes were in fact filmed on each separate occasion by Jeffery. Thank God she managed to get a hold of some footage of the filmed sex tapes, which clearly identify the faces of [REDACTED] [REDACTED] and [REDACTED] having sexual intercourse with her. Frustratingly enough Epstein was not seen in any of the footage but he was clever like that!

After two hours of trying to convince my friend to come forward with me, I eventually managed to persuade her to send me some of the video footage which she kept, implicating all three all men mentioned above. I personally can confirm that I have, with my own two eyes, seen the evidence of these sexual acts, which clearly identifies [REDACTED], [REDACTED], [REDACTED] having sexual intercourse with my friend. I will be more then willing to swear under oath and testify in court over these sex tapes. It will break your heart into a million tiny pieces Maureen when you watch this footage, and I know that what I watched yesterday, will haunt me for the rest of my life!

Unfortunately, I cannot send you the footage without her consent due to massive consequences to her safety but I can confirm that I do have footage in my possession. I have backed up the footage on several USB sticks and have securely sent them to various different locations throughout Europe with only one other person close to me, knowing where their locations are, just in case anything happens to me before the footage is released.

When my friend eventually had the courage to speak out and went to the police in 2008 to report what had happened, nothing was done and she was utterly humiliated by the police department where she went to report what had happened with Epstein, [REDACTED] [REDACTED] and [REDACTED]. She was made to feel like a dirty whore and a liar and wasn't taken seriously. When she then tried to sue Epstein for damages, she was severely bullied and threatened by his lawyer Alan Dershowitz whom she also had sexual relations with and who was also heavily involved in Epstein's paedophile Ring.

A couple months later, she was then approached, [REDACTED] [REDACTED]. They heavily intimidated her, ruffled her up (luckily she took photos as evidence) and was then forced to sign a confidentiality agreement which ensures that she can never come forward publicly implicating her husband.

She was then given a substantial payout, [REDACTED]. She is 1000% certain that the FBI did a cover up and she has the individual names of [REDACTED] [REDACTED] involved in intimidating her. She was then forced against her will to sign a legally binding confidentiality agreement on [REDACTED]'s behalf for her eternal silence. If she breaks this agreement, she is dead.

She told me how it was a complete conspiracy as Alan Dershowitz, whom was one of the lawyers that represented Jeffery when he went to trial, [REDACTED] [REDACTED]

I personally met Alan numerous times as Jeffery had sent him to my legal aid, to deal with a case I was going to open against [REDACTED] [REDACTED] whom I met through the website SugarDaddie.com (he went under the name [REDACTED] on the site). [REDACTED] also tried to rape me with his friend when we were at anchor on his boat in Miami.

Exhibit 6

CONFIDENTIAL

several girls at any one time. She confided in me about her casual "friendship" with [REDACTED] [REDACTED] definitely seemed to have a thing for her and she told me how he kept going on about how he liked her "pert nipples".

[REDACTED] liked flicking and sucking her nipples until they were raw. One evening when we were showering together she showed me her nipples. They looked incredibly painful as they were red and swollen and I remember wincing when I looked at them. I also know she had sexual relations with [REDACTED] at Jeffery's NY mansion on regular occasions as I once met [REDACTED] for coffee, just before she was going to meet [REDACTED] and Epstein together at his mansion.

I will shortly start forwarding you, all the emails which I have managed to save. They include the following:

[REDACTED]
[REDACTED] I moved from Edinburgh to New York in September 2006, where shortly after I was introduced to Jeffery Epstein by [REDACTED]

[REDACTED]
[REDACTED] A couple months later,
[REDACTED] I moved to New York [REDACTED]

I will send you that photo, amongst others as soon as I am able to fly back to the UK next week as I definitely, 100% have it all in my little storage box. I also have other photo's of the Epstein girls and I, whilst on the Island including a couple of pictures of me with [REDACTED] and his then finance [REDACTED]. I met the pair when they visited the Island for the day as [REDACTED] wanted try out his new kite surfing equipment as he had only just started kite surfing and was very eager to try out his new equipment with us girls.

In my secret box, I also have old sim cards which still contain old text messages and telephone numbers which I will have to send you next week once I have them. Hopefully [REDACTED] number will be there and I can trace her somehow, surely?

* Email exchanges with [REDACTED] which includes flight tickets booked for me to St Thomas.

*Email exchanges with [REDACTED], which proves that I was asked to source girls from modelling agencies when I went home to see my family in Cape Town. How Jeffery used education as a way for me to trade my soul to the Devil and become a sex slave to pay for my studies at FIT in New York.

I was desperate to get qualified and get a proper career. The email also show's evidence that I had to become almost anorexic for Jeffery to even entertain the idea of him paying for my tuition. As you will see, [REDACTED] asked me to send her a picture for Jeffery.

I would like to point out that I had to regularly send nude photo's to [REDACTED] so that Jeffery could check how my body looked and if I was putting on any weight.

* An email which was exchanged between [REDACTED] using his code name [REDACTED] via Sugar Daddie.com. I have other correspondence which I had with him in my storage box in England.

* Email exchanges between the girl [REDACTED] whom received funds from Jeffery for introducing me to him.