

EXHIBIT K

GIUFFRE

VS.

MAXWELL

Deposition

VIRGINIA GIUFFRE

05/03/2016

Agren Blando Court Reporting & Video, Inc.

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Denver Colorado, 80202

303-296-0017

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1 e-mailing and speaking with Sharon Churcher in 2011
 2 about the Vanity Fair possibly purchasing your
 3 photograph --
 4 A Um-hum.
 5 Q -- do you recall whether you shared with
 6 Sharon Churcher anything that you had discussed with
 7 your attorney, Mr. Edwards?
 8 A In relationship to what? Like, have I
 9 identified people to her?
 10 Q Right.
 11 A Yes.
 12 Q Okay. So you -- you identified people to
 13 her and you then looped back to her about your
 14 conversations with Mr. Edwards, correct?
 15 MR. EDWARDS: Object to the form.
 16 A I'm sorry, can you rephrase? I don't
 17 understand.
 18 Q (BY MS. MENNINGER) All right. So you
 19 were e-mailing with her --
 20 A Um-hum.
 21 Q -- getting her advice about whether or not
 22 to sell your [REDACTED] picture to Vanity Fair?
 23 A Right.
 24 Q She asked you to run some information by
 25 Brad --

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1 A Yes.
 2 Q -- Edwards. And you said that you were
 3 going to do that?
 4 A Um-hum.
 5 Q And then you spoke to Mr. Edwards,
 6 correct?
 7 A I don't know if I spoke to him or if I
 8 e-mailed him.
 9 Q Okay. And then did you report back to
 10 Sharon Churcher what you had discussed with
 11 Mr. Edwards?
 12 A I'm not too sure. Like I said, going back
 13 to the 2011 e-mails, look at this pile here. It's
 14 impossible for me to know.
 15 Q So you were having a lot of communications
 16 with Sharon Churcher in 2011?
 17 A In 2011, yes.
 18 Q All right. And Mr. Edwards was your
 19 attorney in 2011, correct?
 20 A Yes.
 21 Q And did you ever have Sharon Churcher
 22 draft for you e-mail to send to Mr. Edwards?
 23 A Yes, I believe -- I believe she did.
 24 Q And why did she draft e-mails for you to
 25 send to Mr. Edwards?

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1 A I believe there was -- and this is just
 2 going off my recollection.
 3 Q Um-hum.
 4 A I believe there was a time when she was --
 5 oh, God, I can't remember. I really can't remember
 6 and don't want to say anything without looking at
 7 that exact e-mail. Do you have it to show me?
 8 Q Well, I'm sure it's probably in there but
 9 I don't want to take the time to look for it now.
 10 A Okay.
 11 Q So I understand you're just repeating what
 12 you recall from your memory.
 13 A Yes.
 14 Q And it may not be accurate because you're
 15 not looking at the document. I've got that caveat.
 16 What do you recall, just as you're sitting
 17 there?
 18 A I know there was e-mails that Sharon sent
 19 to me suggesting to say to Brad Edwards, I know that.
 20 I don't remember or recall exactly what was in those
 21 statements.
 22 Q Okay. And did you send those e-mails to
 23 Mr. Edwards, as you recall today?
 24 A I don't know. I'm sorry.
 25 Q And do you know if you went back to Sharon

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1 Churcher and told her about the conversations or
 2 e-mails you had with Mr. Edwards?
 3 A Some of them, I'm sure, yes.
 4 Q Because you were in fairly regular contact
 5 with Sharon Churcher at that time, correct?
 6 A Right, at that time.
 7 Q All right. I want to introduce to you
 8 Defendant's Exhibit 26.
 9 (Exhibit 26 marked.)
 10 Q (BY MS. MENNINGER) Have you seen this
 11 document before?
 12 A I don't know if I've seen this specific
 13 document before, but I've seen something close to it,
 14 I think.
 15 Q All right. Do you see the date on the
 16 document?
 17 A March 10th, 2011.
 18 Q March 9th?
 19 A I see March 10th, sorry.
 20 Q Hmm.
 21 A London, March 10th, 2011.
 22 MR. EDWARDS: Both dates are there.
 23 MS. MENNINGER: I'm sure they are. I'm
 24 just not seeing the one that you're seeing.
 25 THE DEPONENT: Oh, I'm sorry.

e-mailing and speaking with Sharon Churcher in 2011 about the Vanity Fair possibly purchasing your photograph --

A Um-hum.

Q -- do you recall whether you shared with Sharon Churcher anything that you had discussed with your attorney, Mr. Edwards?

A In relationship to what? Like, have I identified people to her?

Q Right.

A Yes.

Q Okay. So you -- you identified people to her and you then looped back to her about your conversations with Mr. Edwards, correct?

MR. EDWARDS: Object to the form.

A I'm sorry, can you rephrase? I don't understand.

Q (BY MS. MENNINGER) All right. So you were e-mailing with her --

A Um-hum.

Q -- getting her advice about whether or not to sell your [REDACTED] picture to Vanity Fair?

A Right.

Q She asked you to run some information by Brad --

A Yes.

Q -- Edwards. And you said that you were going to do that?

A Um-hum.

Q And then you spoke to Mr. Edwards, correct?

A I don't know if I spoke to him or if I e-mailed him.

Q Okay. And then did you report back to Sharon Churcher what you had discussed with Mr. Edwards?

A I'm not too sure. Like I said, going back to the 2011 e-mails, look at this pile here. It's impossible for me to know.

Q So you were having a lot of communications with Sharon Churcher in 2011?

A In 2011, yes.

Q All right. And Mr. Edwards was your attorney in 2011, correct?

A Yes.

Q And did you ever have Sharon Churcher draft for you e-mail to send to Mr. Edwards?

A Yes, I believe -- I believe she did.

Q And why did she draft e-mails for you to send to Mr. Edwards?

A I believe there was -- and this is just going off my recollection.

Q Um-hum.

A I believe there was a time when she was -- oh, God, I can't remember. I really can't remember and don't want to say anything without looking at that exact e-mail. Do you have it to show me?

Q Well, I'm sure it's probably in there but I don't want to take the time to look for it now.

A Okay.

Q So I understand you're just repeating what you recall from your memory.

A Yes.

Q And it may not be accurate because you're not looking at the document. I've got that caveat.

What do you recall, just as you're sitting there?

A I know there was e-mails that Sharon sent to me suggesting to say to Brad Edwards, I know that. I don't remember or recall exactly what was in those statements.

Q Okay. And did you send those e-mails to Mr. Edwards, as you recall today?

A I don't know. I'm sorry.

Q And do you know if you went back to Sharon

Churher and told her about the conversations or e-mails you had with Mr. Edwards?

A Some of them, I'm sure, yes.

Q Because you were in fairly regular contact with Sharon Churher at that time, correct?

A Right, at that time.

Q All right. I want to introduce to you Defendant's Exhibit 26.

(Exhibit 26 marked.)

Q (BY MS. MENNINGER) Have you seen this document before?

A I don't know if I've seen this specific document before, but I've seen something close to it, I think.

Q All right. Do you see the date on the document?

A March 10th, 2011.

Q March 9th?

A I see March 10th, sorry.

Q Hmm.

A London, March 10th, 2011.

MR. EDWARDS: Both dates are there.

MS. MENNINGER: I'm sure they are. I'm just not seeing the one that you're seeing.

THE DEPONENT: Oh, I'm sorry.