

EXHIBIT K

GIUFFRE

VS.

MAXWELL

Deposition

VIRGINIA GIUFFRE

05/03/2016

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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.