

EXHIBIT 1
(File Under Seal)

From: Ross Gow [REDACTED]
Sent: 10 November 2015 18:16
To: Gmax; Philip Barden
Subject: Fwd: Inquiry from The New York Times

Hi Ghislaine and Philip
Please advise how you wish to respond...
Best
Ross

----- Forwarded message -----

From: Meier, Barry [REDACTED]
Date: Tuesday, 10 November 2015
Subject: Inquiry from The New York Times
To: [REDACTED]

Mr. Gow,
Good day. I am a reporter for the Times and it is my understanding that you represent Ghislaine Maxwell. I am working on an article about the legal fallout from the Jeffrey Epstein case. I anticipate mentioning the lawsuit filed earlier this year by Virginia Roberts Guiffie against Ms. Maxwell. How does she respond?
Kindly advise by close of business Thursday, November 12, 2015.
And call me if you have any questions.
Regards,
Barry Meier

--
The New York Times
620 Eighth Avenue
New York, NY 10018
[REDACTED]

--

Ross Gow
Managing Partner
ACUITY Reputation

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