

# **EXHIBIT 8**

United States District Court  
Southern District Of New York

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<p><b>Virginia L. Giuffre,</b>  <b>Plaintiff,</b>  <b>v.</b>  <b>Ghislaine Maxwell,</b>  <b>Defendant.</b></p>	.....	<p><b>15-cv-07433-RWS</b></p>
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**DEFENDANT GHISLAINE MAXWELL'S  
INITIAL F.R.C.P. 26(a)(1)(A) DISCLOSURES**

Pursuant to F.R.C.P. 26(a)(1)(A), Defendant Ghislaine Maxwell makes the following disclosures:

**I. IDENTITIES OF INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION RELEVANT TO DISPUTED FACTS ALLEGED WITH PARTICULARITY IN THE PLEADINGS**

1. Ghislaine Maxwell  
c/o Laura A. Menninger, Esq.  
Haddon, Morgan & Foreman, P.C.  
150 E. 10<sup>th</sup> Ave.  
Denver, CO 80203  
303-831-7364  
[LMenninger@HMFLaw.com](mailto:LMenninger@HMFLaw.com)

Ms. Maxwell is the Defendant and may have knowledge concerning matters at issue, including the events of 1999-2002 and the publication of statements in the press in 2011-2015.

2. Virginia Lee Roberts Giuffre  
c/o Sigrid S. McCawley, Esq.  
Boies, Schiller & Flexner LLP  
401 East Las Olas Boulevard, Suite 1200

Mr. Edwards has knowledge concerning Plaintiff's false statements to the press, in court pleadings, and in sworn testimony at issue in this matter. Mr. Edwards also has knowledge concerning "Victim's Refuse Silence, Inc."

7. Jeffrey Epstein  
c/o Tonja Haddad Coleman, Esq.  
315 SE 7th Street, Suite 301  
Fort Lauderdale, FL 33301  
(954) 467-1223

Mr. Epstein has knowledge concerning Plaintiff's false statements to the press and in court pleadings, as well as the events of 1999-2002 concerning Plaintiff and Defendant.

8. Anthony Figueroa  
Address unknown at this time  
Telephone number unknown at this time

Mr. Figueroa may have knowledge concerning matters at issue, including Plaintiff's activities during 1996 – 2002.

9. Louis Freeh  
Address unknown at this time



Mr. Freeh may have knowledge concerning travel of Bill Clinton.

10. Robert Giuffre  
Address unknown at this time  
Telephone number unknown at this time

Mr. Giuffre is may have knowledge concerning matters at issue, including Plaintiff's activities during 2002-2016 and her damages allegations.

11. Ross Gow  
Acuity Representation  
23 Berkeley Square  
London W1J 6HE



Mr. Gow may have knowledge concerning matters at issue, including the publication of statements in the press in 2011-2015 concerning Plaintiff and Defendant.

Dated: February 24, 2016.

Respectfully submitted,

*s/ Laura A. Menninger*

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Laura A. Menninger (LM-1374)  
HADDON, MORGAN AND FOREMAN, P.C.  
150 East 10<sup>th</sup> Avenue  
Denver, CO 80203  
Phone: 303.831.7364  
Fax: 303.832.2628  
lmenninger@hmflaw.com

*Attorney for Ghislaine Maxwell*

#### CERTIFICATE OF SERVICE

I certify that on February 24, 2016, I electronically served this *DEFENDANT GHISLAINE MAXWELL'S INITIAL F.R.C.P. 26(A)(1) DISCLOSURES* via e-mail on the following:

Sigrid S. McCawley  
BOIES, SCHILLER & FLEXNER, LLP  
401 East Las Olas Boulevard, Ste. 1200  
Ft. Lauderdale, FL 33301  
smccawley@bsflp.com

*s/ Laura A. Menninger*

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Laura A. Menninger