

**United States District Court
Southern District of New York**

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

**REDACTED DECLARATION OF SIGRID S. McCawley IN SUPPORT OF
PLAINTIFF VIRGINIA GIUFFRE'S REPLY IN SUPPORT OF MOTION FOR
FORENSIC EXAMINATION**

I, Sigrid S. McCawley, declare that the below is true and correct to the best of my knowledge as follows:

1. I am a partner with the law firm of Boies, Schiller & Flexner LLP and duly licensed to practice in Florida and before this Court pursuant to this Court's September 29, 2015 Order granting my Application to Appear Pro Hac Vice.
2. I respectfully submit this Declaration in support of Plaintiff Virginia Giuffre's Reply In Support of Motion For Forensic Examination.
3. Attached hereto as Exhibit 1, is a true and correct copy of Letter dated April 11, 2016 from Laura Menninger, Counsel for Defendant.
4. Attached hereto as Exhibit 2, is a true and correct copy of Message Pads messages.

5. Attached hereto as Exhibit 3, is a true and correct copy of Defendant Ghislaine Maxwell's Responses and Objections to Plaintiff's First Request For Production of Documents.

6. Attached hereto as Exhibit 4, is a true and correct copy of [REDACTED]
[REDACTED]

7. Attached hereto as Exhibit 5, is a true and correct copy of correspondence dated April 7, 1026 from Sigrid McCawley, Counsel for Plaintiff.

8. Attached hereto as Exhibit 6, is a true and correct copy of correspondence dated March 10, 2016 from Sigrid McCawley, Counsel for Plaintiff.

9. Attached hereto as Exhibit 7, is a true and correct copy of an excerpt from the Deposition of Ghislaine Maxwell taken April 22, 2016.

10. Attached hereto as Exhibit 8, is a true and correct copy of an excerpt from the Deposition of Ghislaine Maxwell taken April 22, 2016.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Sigrid S. McCawley
Sigrid S. McCawley, Esq.

Dated: April 25, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 25, 2016, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I also certify that the foregoing document is being served this day on the individuals identified below via transmission of Notices of Electronic Filing generated by CM/ECF.

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/s/ Sigrid S. McCawley
Sigrid S. McCawley, Esq.