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'S MOTION TO COMPEL DEFENDANT TO ANSWER DEPOSITION QUESTIONS FILED UNDER SEAL

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's Motion to Compel

Defendant To Answer Deposition Questions Filed Under Seal.

- 3. Attached hereto as Exhibit 1, is a true and correct copy of
- 4. Attached hereto as Exhibit 2, are true and correct copies of

5. Attached hereto as Exhibit 3, is a true and correct copy of the Palm Beach police

report.

6. Attached hereto as Exhibit 4, are true and correct copies of

7. Attached hereto as Exhibit 5, is a true and correct copy of

.

8. Attached hereto as Composite Exhibit 6, are true and correct copies

9. Attached hereto as Exhibit 7, is a true and correct copy

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

/s/ Sigrid S. McCawley Sigrid S. McCawley, Esq. Dated: May 5, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: <u>/s/ Sigrid McCawley</u> Sigrid McCawley (Pro Hac Vice) Boies, Schiller & Flexner LLP 401 E. Las Olas Blvd., Suite 1200 Ft. Lauderdale, FL 33301 (954) 356-0011

> David Boies Boies, Schiller & Flexner LLP 333 Main Street Armonk, NY 10504

> Ellen Brockman Boies, Schiller & Flexner LLP 575 Lexington Ave New York, New York 10022 (212) 446-2300

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 5, 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.

Laura A. Menninger, Esq. Jeffrey Paliuca, Esq. HADDON, MORGAN & FOREMAN, P.C. 150 East 10th Avenue Denver, Colorado 80203 Tel: (303) 831-7364 Fax: (303) 832-2628 <u>Email: Imenninger@hmflaw.com</u>

> <u>/s/ Sigrid S. McCawley</u> Sigrid S. McCawley, Esq.