

**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 FOR LEAVE TO SERVE THREE DEPOSITION SUBPOENAS
BY MEANS OTHER THAN PERSONAL SERVICE 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 for Leave to Serve Three Deposition Subpoenas by Means Other Than Personal Service, Filed Under Seal.
3. Attached hereto as Composite Exhibit 1, is a true and correct copy of Subpoenas for Deposition for Jeffrey Epstein, Sarah Kellen (aka Sarah Kensington and Sarah Vickers), and Nadia Marcinkova.





5. Attached hereto as Composite Exhibit 3, is a true and correct copy of Email Correspondence with Marty Weinberg, attorney for Jeffrey Epstein.

6. Attached hereto as Exhibit 4, is a true and correct copy of the Affidavit of Douglas G. Mercer, Chief Investigator at Alpha Group.

7. Attached hereto as Exhibit 5, is a true and correct copy of the March 31, 2016 Email Correspondence with Bruce Reinhart, Attorney for Sarah Kellen.

8. Attached hereto as Exhibit 6, is a true and correct copy of the May 23, 2016 Email Correspondence with Jack Goldberger, Attorney for Nadia Marcinkova.

9. Attached hereto as Exhibit 7, is a true and correct copy of Excerpts from the April 13, 2010 Deposition Transcript of Nadia Marcinkova.

10. Attached hereto as Composite Exhibit 8, is a true and correct copy of Excerpts from the March 24, 2010 Deposition Transcript of Sarah Kellen.

11. Attached hereto as Composite Exhibit 9, is a true and correct copy of the 2009 Notice of Taking Deposition, Subpoena and Cancellation Notice, and January 13, 2015 Daily Mail Article.

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

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

Dated: May 25, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

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¹ This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah for this private representation.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 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
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