

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

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

**DECLARATION OF SIGRID S. McCawley IN SUPPORT OF
PLAINTIFF'S MOTION TO COMPEL THE PRODUCTION OF DOCUMENTS
SUBJECT TO IMPROPER OBJECTIONS**

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 Motion to Compel Production of Documents Subject to Improper Objections.

3. Attached hereto as Exhibit 1, is a true and correct copy of an Excerpt from the March 24, 2010 Deposition Transcript of Sarah Kellen.

4. Attached hereto as Exhibit 2, is a true and correct copy of Defendant Ghislaine Maxwell's Responses and Objections to Plaintiff's First Request for Production.

5. Attached hereto as Exhibit 3, is a true and correct copy of Defendant Ghislaine Maxwell's Privilege Log.

6. Attached hereto as Exhibit 4, is a true and correct copy of Jeffrey Epstein's private plane Flight Logs.

7. Attached hereto as Composite Exhibit 5, is a true and correct copy of excerpts from the July 29, 2009 and August 7, 2009 Deposition Transcripts of Alfredo Rodriguez.

8. Attached hereto as Composite Exhibit 6, is a true and correct copy of the message pads obtained from Jeffrey Epstein's residence by law enforcement.

9. Attached hereto as Composite Exhibit 7, is a true and correct copy of the September 9, 2008 Victim Notification Letter.

10. Attached hereto as Composite Exhibit 8, is a true and correct copy of the Notice of Deposition of Ghislaine Maxwell, Subpoena and Cancellation Payment Notice, and January 13, 2015 Daily Mail Article.

11. Attached hereto as Exhibit 9, is a true and correct copy of Bates GM_00001 – GM_00015.

12. Attached hereto as Exhibit 10, is a true and correct copy of Jeffrey Epstein's phone book.

13. Attached hereto as Exhibit 11, is a true and correct copy of a photo of Ghislaine Maxwell, Prince Andrew, and Virginia Giuffre.

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

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

Dated: February 26, 2016

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley

Sigrid McCawley (Pro Hac Vice)
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 26, 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