

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

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

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**DECLARATION OF SIGRID S. McCawley IN SUPPORT OF PLAINTIFF VIRGINIA  
GIUFFRE'S CONSOLIDATED REPLY IN SUPPORT OF MOTION TO COMPEL  
PRODUCTION OF DOCUMENTS SUBJECT TO IMPROPER OBJECTIONS AND  
IMPROPER CLAIM OF PRIVILEGE**

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 Consolidated Reply In Support of Motions To Compel Production of Documents Subject To Improper Objections and Improper Claim Of Privilege.

3. Attached hereto as Exhibit 1, is a true and correct copy of Plaintiff Virginia Giuffre's March 3, 2016 Letter Brief to Judge Robert Sweet Regarding Defendant's Refusal to Sit for a Deposition.

4. Attached hereto as Exhibit 2, is a true and correct copy of Defendant Ghislaine Maxwell's Privilege Log.

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

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

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

Dated: March 7, 2016

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on March 7, 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