

**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 REPLY IN RESPONSE TO DEFENDANT'S SUPPLEMENTAL RESPONSE TO MOTION TO COMPEL 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 Reply In Response to Defendant's Supplemental Response to Motion To Compel Production of Documents Subject To Improper Objections [D.E. 45].
3. Attached hereto as Exhibit 1, is a true and correct copy of the Palm Beach Police Department's Report.
4. Attached hereto as Exhibit 2, is a true and correct copy of the Flight Logs from Jeffrey Epstein's private plane.

5. Attached hereto as Exhibit 3, is a true and correct copy of the Message Pads from Law Enforcement's trash pulls from Jeffrey Epstein's Palm Beach mansion.

6. Attached hereto as Exhibit 4, is a true and correct copy of the 2009 Notice of Deposition of Ghislaine Maxwell, Subpoena and Cancellation Payment Notice, and January 13, 2015 Daily Mail Article.

7. Attached hereto as Exhibit 5, is a true and correct copy of Excerpts from the January 12, 2016 Deposition Transcript of Alan Dershowitz.

8. Attached hereto as Exhibit 6, is a true and correct copy of Defendant Ghislaine Maxwell's Privilege Log.

9. Attached hereto as Exhibit 7, is a true and correct copy of the Deposition Transcripts of Juan Alessi.

10. Attached hereto as Exhibit 8, is a true and correct copy of the February 2, 2015 Page Six Article.

11. Attached hereto as Exhibit 9, is a true and correct copy of the September 23, 2007 Red Ice Creations Article.

12. Attached hereto as Exhibit 10, is a true and correct copy of the April 13, 2010 Deposition Transcript of Nadia Marcinkova.

13. Attached hereto as Exhibit 11, is a true and correct copy of the March 24, 2010 Deposition Transcript of Sarah Kellen.

14. Attached hereto as Exhibit 12, is a true and correct copy of a photograph taken by Ms. Giuffre of Defendant Ghislaine Maxwell, Emmy Taylor, and Jeffrey Epstein while they were all in Europe.

15. Attached hereto as Exhibit 13, is a true and correct copy of the Deposition Transcripts of Alfredo Rodriguez.

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

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

Dated: March 14, 2016

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

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

I HEREBY CERTIFY that on March 14, 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