

**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 VIRGINIA GIUFFRE'S RESPONSE IN OPPOSITION TO DEFENDANT'S MOTION TO COMPEL PLAINTIFF TO DISCLOSE PURSUANT TO FED. RULE CIV. PROCEDURE 26(a)(1)

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 Response in Opposition to Defendant's Motion to Compel Plaintiff to Disclose Pursuant to Federal Rule of Civil Procedure [D.E. 64].
3. Attached hereto as Exhibit 1, is a true and correct copy of the 2009 Notice of Taking Deposition, Subpoena and Cancellation Notice, and Daily Mail Article.
4. Attached hereto as Exhibit 2, is a true and correct copy of Plaintiff's Revised Rule 26 Disclosures.
5. Attached hereto as Exhibit 3, is a true and correct copy of Plaintiff's Addendum to Rule 26 Disclosures.

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

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

Dated: March 23, 2016

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 23, 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