

**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 MOTION FOR CLARIFICATION OF COURT'S ORDER
AND FOR FORENSIC EXAMINATION**

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 for Clarification of Court's Order and For Forensic Examination.
3. Attached hereto as Exhibit 1, is a true and correct copy of Sigrid McCawley's March 28, 2016 Correspondence to Laura Menninger and Jeffrey Pagliuca.
4. Attached hereto as Exhibit 2, is a true and correct copy of Sigrid McCawley's April 7, 2016 Correspondence to Laura Menninger and Jeffrey Pagliuca.
5. Attached hereto as Exhibit 3, is a true and correct copy of Defendant's Responses and Objections to Plaintiff's Request for Production.

6. Attached hereto as Exhibit 4, is a true and correct copy of the March 17, 2016 Hearing Transcript before the Honorable Robert Sweet.

7. Attached hereto as Exhibit 5, is a true and correct copy of an Excerpt from the August 7, 2009 Continued Deposition of Alfredo Rodriguez.

8. Attached hereto as Exhibit 6, is a true and correct copy of Sigrid McCawley's March 10, 2016 Correspondence to Laura Menninger.

9. Attached hereto as Exhibit 7, is a true and correct copy of an Excerpt from the Flight Logs.

10. Attached hereto as Exhibit 8, is a true and correct copy of an Excerpt from the Message Pads collected by Law Enforcement from trash pulls of Jeffrey Epstein's Palm Beach mansion.

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

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

Dated: April 13, 2016

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 13, 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