

McCawley Declaration

**EXHIBIT 13
(Filed Under Seal)**

GIUFFRE

VS.

MAXWELL

Deposition

VIRGINIA GIUFFRE

05/03/2016

Agren Blando Court Reporting & Video, Inc.

216 16th Street, Suite 600

Denver Colorado, 80202

303-296-0017

1 Q Okay. And then the last -- the last
2 document, I hope, is --

3 MS. MENNINGER: The big one.

4 (Exhibit 8 marked.)

5 Q (BY MS. MENNINGER) All right. Do you
6 recognize -- I'm going to -- I'm sorry, if I didn't
7 say it already. This is Defendant's Exhibit 8.

8 Do you recognize this document?

9 A Yes, I do.

10 Q And what is this document?

11 A This is a manuscript that I was writing, I
12 believe, back in 2011 regarding some of my life
13 story. And just to make it known, this is a based on
14 true events. But I wouldn't say fictional, but just
15 based on true events.

16 Not everything in it is -- not everything
17 is in there and not everything is, you know, correct.
18 So there's a few mistakes in there.

19 Q Okay. Off the top of your head, do you
20 recall any mistakes that are in there now without
21 reading the 140-page document?

22 MR. EDWARDS: We're going to be here a
23 long time.

24 A Yeah, we could be here a very long time.
25 I mean, I'd like to say a majority of it is correct.