

**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 STAN POTTINGER IN SUPPORT OF
MOTION FOR PROTECTIVE ORDER FOR NON PARTY WITNESS**

I, Stan Pottinger, declare that the below is true and correct to the best of my knowledge as follows:

1. I am a lawyer and duly licensed to practice in New York before this Court pursuant to this Court's Order granting my Application to Appear Pro Hac Vice.
2. I respectfully submit this Declaration in Support of Motion for Protective Order for Non-Party Witness.
3. Attached hereto as Sealed Exhibit 1 is a true and correct copy of Excerpts from April 22, 2016, Deposition of Ghislaine Maxwell.
4. Attached hereto as Sealed Exhibit 2 are true and correct copies of Excerpts from February 17, 2017, Deposition of Sarah Ransome.

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

/s/ J. Stanley Pottinger

J. Stanley Pottinger, Esq.

Counsel for Sarah Ransome

Dated: February 22, 2017.

Respectfully Submitted,

By: /s/ J. Stanley Pottinger
J. Stanley Pottinger
Counsel for Sarah Ransome

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on the 22nd day of February 2017, 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 to all parties of record via transmission of the Electronic Court Filing System generated by CM/ECF.

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¹ This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah for this private representation.