

EXHIBIT 4

**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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AFFIDAVIT OF J. STANLEY POTTINGER

J. Stanley Pottinger, being duly sworn, deposes and says:

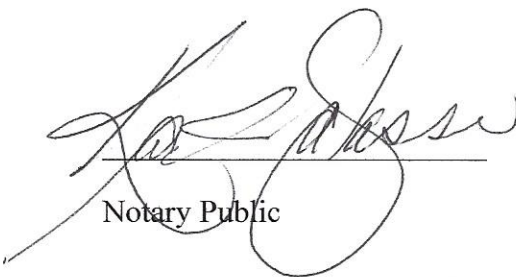
1. I am over 18 years of age.
2. I am an attorney licensed to practice law in New York and I am in good standing.
3. I have a motion for admission pro hac vice pending in the above-captioned action.
4. I represent the plaintiff in the above-captioned action, Virginia Giuffre, as her attorney.
5. I have provided legal advice to Ms. Giuffre in relation to the above-captioned action.
6. In connection with my representation of Ms. Giuffre in the above-captioned action, I am in regular contact with Ms. Giuffre, and I am in near daily contact with my co-counsel on this case: Sigrid McCawley, Paul Cassell, Brad Edwards, and Meredith Schultz.
7. In connection with my representation of Ms. Giuffre in the above-captioned action, I have been actively engaged in giving legal advice on the day-to-day legal strategy of this case.

8. I represent Virginia Giuffre as her attorney in *Edwards v. Dershowitz*, Case No. 15-000072, in the Circuit Court of the Seventeenth Judicial Circuit in and for Broward County, Florida ("Dershowitz Action"), wherein she is a non-party witness.
9. I have provided legal advice to Ms. Giuffre with regard to the incorporation and corporate structure of Victims Refuse Silence, a not-for-profit foundation created to aid survivors of sexual assault.
10. I have never been employed or retained by Ms. Giuffre as a literary agent or a public-relations professional.
11. I have never provided advice to Ms. Giuffre relating to writing, publishing, or promoting a book or memoir.


J. STANLEY POTTINGER

Sworn to before me this

27th day of May, 2016


Notary Public

