

**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 OPPOSITION OF DEFENDANT'S
MOTION TO QUASH SUBPOENA OF JEFFREY EPSTEIN**

I, Sigrid S. McCawley, declare that the below is true and correct to the best of my knowledge as follows:

1. I am an 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 Order granting my Application to Appear Pro Hac Vice.
2. I respectfully submit this Declaration in opposition of Defendant's Motion to Quash Subpoena to Jeffrey Epstein.
3. Attached hereto as Exhibit 1, is a true and correct copy of Sigrid McCawley's March 7, 2016 Correspondence to Martin G. Weinberg, Esquire.
4. Attached hereto as Exhibit 2, is a true and correct copy of Sigrid McCawley's May 23, 2016 Correspondence to Martin G. Weinberg.
5. Attached hereto as Composite Exhibit 3, is a true and correct copy of Sigrid

McCawley's May 25, 2016 and May 26, 2016 Correspondence to Martin G. Weinberg.

6. Attached hereto as Exhibit 4, is a true and correct copy of Douglas G. Mercer's Affidavit of Service dated May 24, 2016.

7. Attached hereto as Exhibit 5, is a true and correct copy of Excerpts from the March 8, 2010 Deposition Transcript of Jeffrey Epstein.

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

/s/ Sigrid McCawley
Sigrid McCawley

Dated: June 20, 2016

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley
Sigrid McCawley (Pro Hac Vice)
Meredith Schultz (Pro Hac Vice)
Boies, Schiller & Flexner LLP
401 E. Las Olas Blvd., Suite 1200
Ft. Lauderdale, FL 33301
Tel: (954) 356-0011
Email: smccawley@bsfllp.com

David Boies
Boies, Schiller & Flexner LLP
333 Main Street
Armonk, NY 10504

Paul G. Cassell (Pro Hac Vice)
Ronald N. Boyce Presidential Professor of
Criminal Law
S.J. Quinney College of Law at the
University of Utah
383 S. University St.
Salt Lake City, UT 84112-0730
(801) 585-5202 (phone)
(801) 585-2750 (fax)
Email: cassellp@law.utah.edu

Bradley Edwards (Pro Hac Vice)
Farmer, Jaffe, Weissing, Edwards,
Fistos & Lehrman, P.L.
425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301
Tel: (954) 524-2820
Fax: (954) 524-2822
Email: brad@pathtojustice.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 20, 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 and to all related parties via transmission of the Electronic Court Filing System generated by CM/ECF.

Laura A. Menninger, Esq.
Jeffrey Paliuca, Esq.
HADDON, MORGAN & FOREMAN, P.C.
150 East 10th Avenue
Denver, Colorado 80203
Tel: (303) 831-7364
Fax: (303) 832-2628
[Email: lmenninger@hmflaw.com](mailto:lmenninger@hmflaw.com)

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