

**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 MEREDITH SCHULTZ IN OPPOSITION TO DEFENDANT'S
MOTION TO STRIKE PLAINTIFF VIRGINIA GIUFFRE'S MOTION FOR AN
ADVERSE INFERENCE INSTRUCTION PURSUANT TO RULE 37(B), (E), AND (F),
FED. R. CIV. P.**

I, Meredith L. Schultz, declare that the below is true and correct to the best of my knowledge as follows:

1. I am an associate 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 March 28, 2016 Order granting my Application to Appear Pro Hac Vice.
2. I respectfully submit this Declaration in Opposition to Defendant's Motion to strike Plaintiff Virginia Giuffre's Motion for An Adverse Inference Instruction Pursuant to Rule 37(B), (E) and (F) Fed. R. Civ. P.
3. Attached hereto as Exhibit 1 is a true and correct copy of July 13, 2016 email correspondence from Laura Menninger.
4. Attached hereto as Exhibit 2 is a true and correct copy of June 8, 2016 Letter correspondence from Meredith L. Schultz.
5. Attached hereto as Exhibit 3 is a true and correct copy of June 13, 2016 Letter Correspondence from Meredith L. Schultz.

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

/s/ Meredith L. Schultz
Meredith L. Schultz, Esq.

Dated: July 18, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

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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.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 18th day of July, 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 to all parties of record via transmission of the Electronic Court Filing System generated by CM/ECF.

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/s/ Meredith L. Schultz
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