

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 SUPPORT OF
PLAINTIFF'S MOTION FOR PROTECTIVE ORDER AND MOTION FOR THE
COURT TO DIRECT DEFENDANT TO DISCLOSE ALL INDIVIDUALS TO WHOM
DEFENDANT HAS DISSEMINATED CONFIDENTIAL INFORMATION**

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

1. I am a 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 September 29, 2015 Order granting my Application to Appear Pro Hac Vice.

2. I respectfully submit this Declaration in Support of Plaintiff's Motion for Protective Order and Motion for The Court to Direct Defendant To Disclose All Individuals To Whom Defendant Has Disseminated Confidential Information.

3. Attached hereto as Sealed Exhibit 1 is a true and correct copy of May 18, 2016, Correspondence from Jeff Pagliuca to Meredith Schultz.

4. Attached hereto as Sealed Exhibit 2 is a true and correct copy of May 20, 2016, Correspondence from Meredith Schultz to Jeff Pagliuca.

5. Attached hereto as Exhibit 3 is a true and correct copy of July 29, 2016, Correspondence from Ty Gee to Meredith Schultz.

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

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

Dated: August 8, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid S. McCawley
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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 8th day of August, 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/ Sigrid S. McCawley
Sigrid S. McCawley