

**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 MCCAWLEY IN SUPPORT OF PLAINTIFF’S REPLY IN
SUPPORT OF PLAINTIFF’S MOTION TO COMPEL (DE 345)**

I, Sigrid 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 Order granting my Application to Appear Pro Hac Vice.

2. I respectfully submit this Declaration in Support of Plaintiff’s Reply in Support of Plaintiff’s Motion to Compel (DE 345).

3. Attached hereto as Sealed Exhibit 1 is a true and correct copy of [REDACTED]

[REDACTED]

4. Attached hereto as Sealed Exhibit 2 is a true and correct copy of January 8, 2015, Online Article from The Sun.

5. Attached hereto as Sealed Exhibit 3 is a true and correct copy of August 16, 2016, Correspondence from Laura Menninger.

6. Attached hereto as Sealed Exhibit 4 is a true and correct copy of Excerpts from June 1 2016, Deposition of John Alessi.

7. Attached hereto as Sealed Exhibit 5 is a true and correct copy of [REDACTED]

[REDACTED].

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

/s/ Sigrid McCawley

Sigrid McCawley, Esq.

Dated: August 24, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 24th 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
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