

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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VIRGINIA L. GIUFFRE,
Plaintiff,
v.
GHISLAINE MAXWELL,
Defendant.
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15-cv-07433-RWS

Declaration of Mary E. Borja

I, **Mary E. Borja**, declare as follows:

1. I am an attorney at law duly licensed in the District of Columbia.
2. I am familiar generally with the subject matter of this action, No. 15-cv-07433-RWS (S.D.N.Y.).
3. From 2015 to the present time I have been representing **Professor Alan Dershowitz** in *Edwards v. Dershowitz*, No. CACE 15-000072 (Fla. Cir. Ct.). Although Ms. Giuffre is not a party to the Florida state court action, central to that action are her allegations that she was the victim of “sexual trafficking.”
4. Based on my knowledge of the **Florida** action and this action, I **believe Professor Dershowitz** and Defendant Ghislaine Maxwell have a **common interest**, namely, of defending against allegations by and on behalf of Ms. Giuffre regarding alleged abuse.
5. During the course of my representation **of Professor Dershowitz**, I have on various occasions exchanged information via email with Ms. Maxwell’s counsel Laura Menninger. These emails are attorney work product because the information we exchanged implicates my or

Ms. Menninger's or both of our mental impressions, conclusions, opinions and/or theories concerning the defense of Ms. Giuffre's allegations and related factual and legal matters.

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

Executed on August 19, 2016.

s/ Mary E. Borja
Mary E. Borja

CERTIFICATE OF SERVICE

I certify that on August 19, 2016, I electronically served this *Declaration of Mary E. Borja* via ECF on the following:

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