

**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 SUPPORT OF  
PLAINTIFF'S MOTION TO COMPEL THE PRODUCTION OF DOCUMENTS  
SUBJECT TO IMPROPER OBJECTION AND IMPROPER CLAIMS OF PRIVILEGE**

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

1. I am a 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 Support of Plaintiff's Motion to Compel the Production of Documents Subject to Improper Objection and Improper Claims of Privilege.
3. Attached hereto as Sealed Exhibit 1 is a true and correct copy of June 8, 2016, Correspondence to Jeff Pagliuca.
4. Attached hereto as Sealed Exhibit 2 is a true and correct copy of June 13, 2016, Correspondence to Laura Menninger.
5. Attached hereto as Sealed Composite Exhibit 3 are true and correct copies of July 18, 2016 and July 21, 2016, Correspondence from Paul Cassell to Ty Gee.
6. Attached hereto Exhibit 4 is a true and correct copy of Defendant's Third Amended Privilege Log.

7. Attached hereto as Sealed Exhibit 5 is a true and correct copy of the April 15, 2016, Sealed Order Granting in Part Plaintiff's Motion to Compel for Improper Claim of Privilege.

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

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

Dated: August 9, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Meredith Schultz

Meredith Schultz (Pro Hac Vice)  
Meredith Schultz (Pro Hac Vice)  
Boies Schiller & Flexner LLP  
401 E. Las Olas Blvd., Suite 1200  
Ft. Lauderdale, FL 33301  
(954) 356-0011

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

Bradley J. Edwards (Pro Hac Vice)  
FARMER, JAFFE, WEISSING,  
EDWARDS, FISTOS & LEHRMAN, P.L.  
425 North Andrews Avenue, Suite 2  
Fort Lauderdale, Florida 33301  
(954) 524-2820

Paul G. Cassell (Pro Hac Vice)  
S.J. Quinney College of Law  
University of Utah  
383 University St.  
Salt Lake City, UT 84112  
(801) 585-5202<sup>1</sup>

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<sup>1</sup> 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 9<sup>th</sup> 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.

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

/s/ Meredith L. Schultz  
Meredith L. Schultz