

**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
SUPPLEMENT TO MOTION FOR ADVERSE INFERENCE INSTRUCTION BASED
ON NEW 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 Supplement to Motion for Adverse Inference Instruction Based on New Information.

3. Attached hereto as Exhibit 1 is a true and correct copy of July 29, 2016, Correspondence from Ty Gee.

4. Attached hereto as Sealed Exhibit 2 is a true and correct copy of Excerpt from April 22, 2016, Deposition of Ghislaine Maxwell.

5. Attached hereto as Sealed Exhibit 3 is a true and correct copy of Excerpt from July 22, 2016, Deposition of Ghislaine Maxwell.

6. Attached hereto as Sealed Exhibit 4 is a true and correct copy of Excerpts from June 10, 2016, Deposition of Rinaldo Rizzo.

7. Attached hereto as Sealed Exhibit 5 is a true and correct copy of Excerpts from June 21, 2016, Deposition of Detective Joseph Recarey.

8. Attached hereto as Sealed Exhibit 6 is a true and correct copy of Excerpts from May 18, 2016, Deposition of [REDACTED]

9. Attached hereto as Sealed Exhibit 7 is a true and correct copy of Excerpts from June 1, 2016, Deposition of Juan Alessi.

10. Attached hereto as Sealed Exhibit 8 is a true and correct copy of the sworn testimony of [REDACTED].

11. Attached hereto as Exhibit 9 is a true and correct copy of Rule 45 Subpoena to Microsoft.

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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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
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