

**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  
REPLY IN SUPPORT OF MOTION TO REOPEN DEFENDANT'S DEPOSITION  
BASED ON LATE PRODUCTION OF NEW, KEY DOCUMENTS**

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

1. I am an 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 Order granting my Application to Appear Pro Hac Vice.

2. I respectfully submit this Declaration in Support of Plaintiff's Reply In Support of Motion to Reopen Defendant's Deposition Based on Late Production of New, Key Documents.

3. Attached hereto as Sealed Exhibit 1 is a true and correct copy of Excerpts from May 18, 2016, Deposition of Johanna Sjoborg.

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

/s/ Meredith Schultz  
Meredith Schultz, Esq.

Dated: October 28, 2016.

Respectfully Submitted,  
BOIES, SCHILLER & FLEXNER LLP

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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 28th day of October, 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/ Meredith Schultz  
\_\_\_\_\_  
Meredith Schultz