

**United States District Court
Southern District of New York**

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

V.

Ghislaine Maxwell,

Defendant.

**NON-REDACTEDDECLARATION OF MEREDITH L. SCHULTZ IN SUPPORT OF
PLAINTIFF VIRGINIA GIUFFRE’S RESPONSE IN OPPOSITION TO DEFENDANT’S
MOTION TO COMPEL NON-PRIVILEGED DOCUMENTS**

I, Meredith L. 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 March 28, 2016, Order granting my Application to Appear Pro Hac Vice.
2. I respectfully submit this Declaration in support of Plaintiff Virginia Giuffre's Response in Opposition to Defendant's Motion to Compel Non-Privileged Documents.

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[REDACTED]

6. Attached hereto as Exhibit 4, Affidavit of J. Stanley Pottinger.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

9. Attached hereto as Exhibit 7 is a true and correct copy of the Privilege Log
Identities.

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

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

Dated: May 4, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 4, 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 this day on the individuals identified below via transmission of Notices of Electronic Filing generated by CM/ECF.

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/s/ Sigrid S. McCawley
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