## UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

VIRGINIA GIUFFRE,	:	
	:	
Plaintiff,	:	
<b>v.</b>	:	No.15-cv-07433-RWS
	:	
GHISLAINE MAXWELL,	:	
	:	
Defendant.	:	

## SUPPLEMENTAL DECLARATION OF GREGORY L. POE IN SUPPORT OF MOTION TO QUASH (OR IN THE ALTERNATIVE MODIFY) SUBPOENA AND FOR A PROTECTIVE ORDER

I, Gregory L. Poe, hereby declare as follows:

I am the sole member of the Law Offices of Gregory L. Poe PLLC in Washington,
D.C. I represent non-party Jeffrey Epstein with respect to a Fed. R. Civ. P. 45 subpoena in the above-referenced matter.

2. I am admitted to practice in the District of Columbia. My D.C. Bar number is 426020. I am a member in good standing of the D.C. Bar. The Court granted my application to appear *pro hac vice* in the above-referenced matter on June 20, 2016 (Dkt. 225).

3. I respectfully submit this supplemental declaration pursuant to 28 U.S.C. § 1746 in support of Mr. Epstein's motion to quash (or in the alternative modify) the subpoena and for a protective order (Dkt. 222).

4. Attached hereto as Exhibit 1 is a true and correct copy of an email chain that includes communications among counsel from June 12-14, 2016.

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I declare under penalty of perjury on this 21st day of June 2016 that the foregoing is true and correct.

<u>/s/ Gregory L. Poe</u> Gregory L. Poe Counsel for Non-Party Jeffrey Epstein

## **CERTIFICATE OF SERVICE**

I hereby certify that, on this 21st day of June, 2016, I caused a true and correct copy of the foregoing Supplemental Declaration of Gregory L. Poe in Support of Jeffrey Epstein's Motion to Quash (or in the Alternative Modify) Subpoena and for a Protective Order to be served via the Court's CM/ECF system on the following:

Sigrid S. McCawley Meridith Schultz BOIES, SCHILLER & FLEXNER, LLP 401 East Las Olas Boulevard, Ste. 1200 Ft. Lauderdale, FL 33301 <u>smccawley@bsfllp.com</u> <u>mschultz@bsfllp.com</u>

Paul G. Cassell 383 S. University Street Salt Lake City, UT 84112 cassellp@law.utah.edu

Bradley J. Edwards FARMER, JAFFE, WEISSING, EDWARDS, FISTOS & LEHRMAN, P.L. 425 North Andrews Ave., Ste. 2 Ft. Lauderdale, FL 33301 brad@pathtojustice.com

Laura A. Menninger Jeffrey S. Pagliuca HADDON, MORGAN AND FOREMAN, P.C. 150 East 10th Avenue Denver, CO 80203 Phone: 303.831.7364 Fax: 303.832.2628 Imenninger@hmflaw.com

> <u>/s/ Rachel S. Li Wai Suen</u> Rachel S. Li Wai Suen