

**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 REPLY IN SUPPORT OF MOTION TO
EXTEND THE DEADLINE TO COMPLETE DEPOSITIONS AND OPPOSITION TO
MOTION FOR SANCTIONS FOR VIOLATION OF RULE 45**

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 Order granting my Application to Appear Pro Hac Vice.
2. I respectfully submit this Declaration in response to Defendant's Opposition to Motion to Extend Deadline to Complete Depositions and Motion for Sanctions for Violation of Rule 45.
3. Attached hereto as Exhibit 1, is a true and correct copy of Sigrid McCawley's March 7, 2016 Correspondence to Martin G. Weinberg, Esquire.
4. Attached hereto as Exhibit 2, is a true and correct copy of Sigrid McCawley's May

25, 2016 Correspondence to Martin G. Weinberg.

5. Attached hereto as Exhibit 3, is a true and correct copy of Sigrid McCawley's May 23, 2016 Correspondence to Martin G. Weinberg.

6. Attached hereto as Exhibit 4, [REDACTED]
[REDACTED]

7. Attached hereto as Exhibit 5, is a true and correct copy of Gregory Poe's June 16, 2016 correspondence to Bradley Edwards.

8. Attached hereto Exhibit 6, is a true and correct copy of Sigrid McCawley's March 31, 2016 Correspondence to Bruce Reinhart.

9. Attached hereto Exhibit 7, is a true and correct copy of Douglas G. Mercer's Affidavit of Service dated May 24, 2016.

10. Attached hereto as Exhibit 8, is a true and correct copy of Jack Goldberg's May 23, 2016 Correspondence to Sigrid McCawley.

11. Attached hereto Exhibit 9, is a true and correct copy of Sigrid McCawley's June 21, 2016 Correspondence to Bruce Reinhart.

12. Attached hereto Exhibit 10, is a true and correct copy of Plaintiff's Notice of Taking Videotaped Deposition of Jean Luc Brunel.

13. Attached hereto Composite Exhibit 11, is a true and correct copy of Brad Edwards June 14, 2016 Correspondence to Ross Gow.

14. Attached hereto Exhibit 12, is a true and correct copy of transcript of May 24, 2016 Phone Conference with Plaintiff's Attorney, Defendant's Attorney and Judge Robert Sweet.

15. Attached hereto Exhibit 13, [REDACTED]

[REDACTED]

16. Attached hereto Composite Exhibit 14, [REDACTED]

[REDACTED]

17. Attached hereto Exhibit 15, [REDACTED]

[REDACTED]

18. Attached hereto Exhibit 16, is a true and correct copy of Meredith Schultz June 13, 2016 Correspondence to Defendant's Counsel.

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

/s/ Sigrid McCawley

Sigrid McCawley

Dated: June 22, 2016

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley
Sigrid McCawley (Pro Hac Vice)
Meredith Schultz (Pro Hac Vice)
Boies, Schiller & Flexner LLP
401 E. Las Olas Blvd., Suite 1200
Ft. Lauderdale, FL 33301
Tel: (954) 356-0011
Email: smccawley@bsfllp.com

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

Paul G. Cassell (Pro Hac Vice)
Ronald N. Boyce Presidential Professor of
Criminal Law
S.J. Quinney College of Law at the
University of Utah
383 S. University St.
Salt Lake City, UT 84112-0730
(801) 585-5202 (phone)
(801) 585-2750 (fax)
Email: cassellp@law.utah.edu

Bradley Edwards (Pro Hac Vice)
Farmer, Jaffe, Weissing, Edwards,
Fistos & Lehrman, P.L.
425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301
Tel: (954) 524-2820
Fax: (954) 524-2822
Email: brad@pathtojustice.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 22, 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 Paliuca, Esq.
HADDON, MORGAN & FOREMAN, P.C.
150 East 10th Avenue
Denver, Colorado 80203
Tel: (303) 831-7364
Fax: (303) 832-2628
[Email: lmenninger@hmflaw.com](mailto:lmenninger@hmflaw.com)

/s/ Sigrid S. McCawley
Sigrid S. McCawley, Esq.