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 SUR-REPLY IN RESPONSE TO DEFENDANT'S REPLY IN SUPPORT OF MOTION FOR SANCTIONS

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 response to Defendant's Reply in

Support of Motion for Sanctions.

3. Attached hereto as Sealed Exhibit 1, is a true and correct copy of

4. Attached hereto as Sealed Exhibit 2 is a true and correct copy of

5. Attached hereto as Sealed Exhibit 3 is a true and correct copy of

6. Attached hereto as Sealed Exhibit 4 is a true and correct copy of

- 7. Attached hereto as Sealed Exhibit 5 is a true and correct copy of
- 8. Attached hereto as Sealed Exhibit 6 is a true and correct copy
- 9. Attached hereto as Sealed Exhibit 7 is a true and correct copy of
- 10. Attached hereto as Sealed Exhibit 8 is a true and correct copy of

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

/s/ Sigrid S. McCawley Sigrid S. McCawley, Esq. Dated: July 12, 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

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¹ 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 12th day of July, 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

Sigrid S. McCawley