

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 PLAINTIFF'S MOTION FOR AN
ADVERSE INFERENCE INSTRUCTION PURSUANT TO RULE 37(B), FED. R. CIV. P.**

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

1. I am a 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 Plaintiff's Motion for An Adverse Inference Instruction Pursuant to Rule 37(B). FED.R.CIV.P

3. Attached hereto as Exhibit 1 is a true and correct copy of June 30, 2016 Correspondence to Laura A. Menninger

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

[REDACTED]

5. Attached hereto as Exhibit 3 is a true and correct copy of July 8, 2016 Correspondence to Laura A. Menninger

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

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

Dated: July 13, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Meredith Schultz

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 13th 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/ Meredith L. Schultz
Meredith L. Schultz