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

Virginia	L. Giuffre,	
	Plaintiff,	Case No.: 15-cv-07433-RWS
v .		
Ghislain	e Maxwell,	
	Defendant.	

## DECLARATION OF MEREDITH SCHULTZ IN SUPPORT OF PLAINTIFF'S MOTION FOR AN EXTENSION OF TIME TO SERVE PROCESS UPON AND DEPOSE ROSS GOW

- I, Meredith L. Schultz, declare that the below is true and correct to the best of my knowledge as follows:
- 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 Support of Plaintiff's Motion for an Extension of time to Serve Process Upon and Depose Ross Gow.
- 3. Attached hereto as Exhibit 1 are true and correct copies of July 12, 2016 and July 13, 2016 emails to Ross Gow.
- 4. Attached hereto as Exhibit 2 is a true and correct copy of Request for Service Abroad of Judicial or Extrajudicial Documents.
- 5. Attached hereto as Exhibit 3 is a true and correct copy of Acknowledgment of Receipt from Senior Courts of England and Wales Foreign Process Section.
- 6. Attached hereto as Exhibit 4 are true and correct copies of July 13, 2016 emails from Phillip Barden

- 7. Attached hereto as Exhibit 5 is a true and correct copy of Affidavit of Cesar Agusto Sepulveda.
- 8. Attached hereto as Exhibit 6 is a true and correct copy of July 14, 2016 letter to Phillip Barden
- 9. Attached hereto as Exhibit 7 is a true and correct copy of excerpt from Defendant's Response to Plaintiff's First Set of Requests for Admissions.
- 10. Attached hereto as Exhibit 8 is a true and correct copy of excerpt from Defendant's Rule 26 Disclosures.
- 11. Attached hereto as Exhibit 9 is a true and correct copy of July 19, 2016 letter from Philip Barden.

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

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

Dated: July 25, 2016.

Respectfully Submitted,

## **BOIES, SCHILLER & FLEXNER LLP**

By: /s/ Meredith Schultz
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<sup>&</sup>lt;sup>1</sup> 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 25<sup>th</sup> 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