

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 SUPPORT OF PLAINTIFF VIRGINIA
GIUFFRE'S MOTION FOR FINDING OF CIVIL CONTEMPT AGAINST SARAH
KELLEN FOR IGNORING SUBPOENA AND FOR ASSOCIATED SANCTIONS**

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 Support of Plaintiff Virginia Giuffre's Motion for Finding of Civil Contempt Against Sarah Kellen for Ignoring Subpoena and for Associated Sanctions

3. Attached hereto as Composite Exhibit 1 are true and correct copies of Affidavits of Service of Process related to Sarah Kellen.

4. Attached hereto as Exhibit 2 is a true and correct copy of July 21, 2016 Deposition Record Transcript.

5. Attached hereto as Exhibit 3 is a true and correct copy of Sarah Kellen Subpoena.

6. Attached hereto as Composite Exhibit 4 are true and correct copies of July 7, 2016 email to Sarah Kellen and July 11, 2016 letters to Sarah Kellen.

7. Attached hereto as Exhibit 5 is a true and correct copy of July 8, 2016 email to Bruce Reinhart, Esq.

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 L. Schultz
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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 25th 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
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