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'S MOTION TO ENFORCE THE COURT'S ORDER AND DIRECT DEFENDANT TO ANSWER DEPOSITON QUESTIONS FILED UNDER SEAL

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

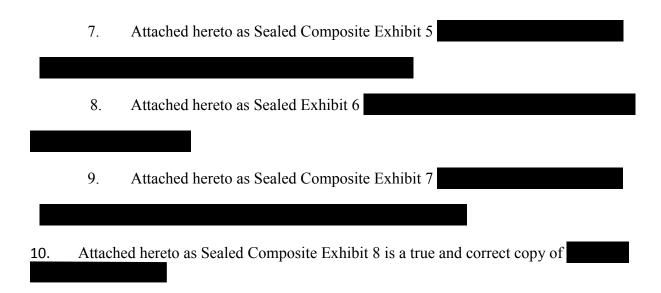
Order granting my Application to Appear Pro Hac Vice.

2. I respectfully submit this Declaration in Support of Plaintiff's Motion to Enforce

the Court's Order and Direct Defendant to Answer Deposition Questions Filed Under Seal.

3.	Attached hereto as Sealed Composite Exhibit 1
4.	Attached hereto as Sealed Composite Exhibit 2
5.	Attached hereto as Sealed Composite Exhibit 3
5.	Attached hereto as Scared Composite Exhibit 5
6.	Attached hereto as Sealed Composite Exhibit 4

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

<u>/s/ Meredith L. Schultz</u> Meredith L. Schultz, Esq. Dated: July 29, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: <u>/s/ Meredith Schultz</u> Meredith Schultz (Pro Hac Vice) Meredith Schultz (Pro Hac Vice) Boies Schiller & Flexner LLP 401 E. Las Olas Blvd., Suite 1200 Ft. Lauderdale, FL 33301 (954) 356-0011

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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 29th 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.

Laura A. Menninger, Esq. Jeffrey Pagliuca, Esq. HADDON, MORGAN & FOREMAN, P.C. 150 East 10th Avenue Denver, Colorado 80203 Tel: (303) 831-7364 Fax: (303) 832-2628 Email: <u>lmenninger@hmflaw.com</u> jpagliuca@hmflaw.com

> /s/ Meredith L. Schultz Meredith L. Schultz