

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 DEPOSITION 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 [REDACTED]

[REDACTED]

4. Attached hereto as Sealed Composite Exhibit 2 [REDACTED]

[REDACTED]

5. Attached hereto as Sealed Composite Exhibit 3 [REDACTED]

[REDACTED]

6. Attached hereto as Sealed Composite Exhibit 4 [REDACTED]

[REDACTED]

7. Attached hereto as Sealed Composite Exhibit 5 [REDACTED]

[REDACTED]

8. Attached hereto as Sealed Exhibit 6 [REDACTED]

[REDACTED]

9. Attached hereto as Sealed Composite Exhibit 7 [REDACTED]

[REDACTED]

10. Attached hereto as Sealed Composite Exhibit 8 is a true and correct copy of [REDACTED]

[REDACTED]

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

/s/ Meredith L. Schultz

Meredith L. Schultz, Esq.

Dated: July 29, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Meredith Schultz

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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.

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/s/ Meredith L. Schultz
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