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 APPLICATION FOR LETTER ROGATORY

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.

 I respectfully submit this Declaration in Support of Plaintiff's Motion for Letter Rogatory.

3. Attached hereto as Composite Exhibit 1 are true and correct copies of June 12,

2016 and June 14, 2016, Correspondence to Ross Gow.

4. Attached hereto as Exhibit 2 is a true and correct copy of a Request for Service Abroad of Judicial or Extrajudicial Documents.

5. Attached hereto as Exhibit 3 is a true and correct copy of July 1, 2016, London, Senior Courts of England and Wales Foreign Process Section, Transmitting Agency Reference: Acknowledgment of Receipt, Article 6(1) of Council Regulation (EC) No 1348/2000.

6. Attached hereto as Composite Exhibit 4 are true and correct copies of July 12,

2016 and July 13, 2016, Correspondence to and from Philip Barden.

Attached hereto as Exhibit 5 is a true and correct copy of Cesar Agusto's Affidavit.

8. Attached hereto as Exhibit 6 is a true and correct copy of July 14, 2016,

Correspondence from Philip Barden.

9. Attached hereto as Sealed Exhibit 7 is a true and correct copy of August 2, 2016 Letter Rogatory.

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

/s/ Meredith L. Schultz_____ Meredith L. Schultz, Esq. Dated: August 3, 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 3rd day of August, 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