

**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 COMPEL THE PRODUCTION OF DOCUMENTS  
SUBJECT TO IMPROPER OBJECTION AND IMPROPER CLAIMS OF PRIVILEGE**

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 Compel the Production of Documents Subject to Improper Objection and Improper Claims of Privilege.

3. Attached hereto as Sealed Exhibit 1 [REDACTED]

[REDACTED]

4. Attached hereto as Sealed Exhibit 2 [REDACTED]

[REDACTED]

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

[REDACTED]

6. Attached hereto Exhibit 4 [REDACTED]

[REDACTED]

7. Attached hereto as Sealed Exhibit 5

[REDACTED]

[REDACTED]

[REDACTED]

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

/s/ Meredith L. Schultz

Meredith L. Schultz, Esq.

Dated: August 9, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Meredith Schultz

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<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 9<sup>th</sup> 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  
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