United States District Court Southern District of New York

Virginia L. G	iuffre	
, 118.11.W 21. 0	Plaintiff,	Case No.: 15-cv-07433-RWS
v .		
Ghislaine Ma	xwell,	
	Defendant.	
PLAINT DEFEN	TIFF'S MOTIO DANT TO ANS	ON OF MEREDITH SCHULTZ IN SUPPORT OF N TO ENFORCE THE COURT'S ORDER AND DIRECT SWER DEPOSITON QUESTIONS FILED UNDER SEAL
,		z, declare that the below is true and correct to the best of my
knowledge as	follows:	
1.	I am a associat	te with the law firm of Boies, Schiller & Flexner LLP and duly
licensed to pr	actice in Florida	and before this Court pursuant to this Court's March 28, 2016
Order grantin	g my Application	n to Appear Pro Hac Vice.
2.	I respectfully s	submit this Declaration in Support of Plaintiff's Motion to Enforce
the Court's O	rder and Direct I	Defendant to Answer Deposition Questions Filed Under Seal.
3.	Attached heret	to as Sealed Composite Exhibit 1
4.	Attached heret	to as Sealed Composite Exhibit 2
5.	Attached heret	to as Sealed Composite Exhibit 3
6.	Attached heret	to as Sealed Composite Exhibit 4

	7.	Attached hereto as Sealed Composite Exhibit 5
	8.	Attached hereto as Sealed Exhibit 6
	9.	Attached hereto as Sealed Composite Exhibit 7
LO.	Attach	ned hereto as Sealed Composite Exhibit 8 is a true and correct copy of
		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
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

David Boies Boies Schiller & Flexner LLP 333 Main Street Armonk, NY 10504

Bradley J. Edwards (Pro Hac Vice) FARMER, JAFFE, WEISSING, EDWARDS, FISTOS & LEHRMAN, P.L. 425 North Andrews Avenue, Suite 2 Fort Lauderdale, Florida 33301 (954) 524-2820

Paul G. Cassell (Pro Hac Vice) S.J. Quinney College of Law University of Utah 383 University St. Salt Lake City, UT 84112 (801) 585-5202¹

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

Tel: (303) 831-7364 Fax: (303) 832-2628

Email: lmenninger@hmflaw.com
jpagliuca@hmflaw.com

/s/ Meredith L. Schultz
Meredith L. Schultz