## **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 SIGRID MCCAWLEY IN SUPPORT OF PLAINTIFF'S REPLY IN SUPPORT OF PLAINTIFF'S MOTION FOR PROTECTIVE ORDER AND TO DIRECT THE DEFENDANT TO DISCLOSE ALL INDIVIDUALS TO WHOM DEFENDANT HAS DISSIMINATED CONFIDENTIAL INFORMATION (DE 335)		
I, Sigrid McCawley, dec	clare that the below is true and correct to the best of my	
knowledge as follows:		
1. I am a Partner wi	th the law firm of Boies, Schiller & Flexner LLP and duly	
licensed to practice in Florida and before this Court pursuant to this Court's Order granting my		
Application to Appear Pro Hac Vice.		
2. I respectfully sub	mit this Declaration in Support of Plaintiff's Reply in Support	
of Motion for Protective Order and to Direct The Defendant To Disclose All Individuals to		
Whom Defendant has Dissiminated Confidential Information (DE 335).		
3. Attached hereto a	as Sealed Composite Exhibit 1 are true and correct copies of	

4. Attached hereto as Sealed Exhibit 2 is a true and correct copy of

5.	Attached hereto as Sealed Exhibit 3 is a true and correct copy of
6.	Attached hereto as Sealed Exhibit 4 is a true and correct copy of
I decl	are under penalty of perjury that the foregoing is true and correct.
	/s/ Sigrid McCawley Sigrid McCawley, Esq.

Dated: August 23, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid S. McCawley
Sigrid S. McCawley(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) 585-5202<sup>1</sup>

\_

<sup>&</sup>lt;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 23rd 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.

Laura A. Menninger, Esq.
Jeffrey Pagliuca, Esq.
HADDON, MORGAN & FOREMAN, P.C.
150 East 10<sup>th</sup> Avenue
Denver, Colorado 80203
Tel: (303) 831-7364

Fax: (303) 831-/364 Fax: (303) 832-2628

Email: <a href="mailto:lmenninger@hmflaw.com">lmenninger@hmflaw.com</a>
<a href="mailto:jpagliuca@hmflaw.com">jpagliuca@hmflaw.com</a>

/s/ Sigrid S. McCawley
Sigrid S. McCawley