

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 MOTION  
TO COMPEL DATA FROM DEFENDANT'S UNDISCLOSED EMAIL ACCOUNT AND  
FOR AN ADVERSE INFERENCE INSTRUCTION**

I, Sigrid McCawley, declare that the below is true and correct to the best of my knowledge as follows:

1. I am a Partner 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 Order granting my Application to Appear Pro Hac Vice.

2. I respectfully submit this Declaration in Support of Plaintiff's Motion to Compel Data from Defendant's Undisclosed Email Account and for Adverse Inference Instruction.

3. Attached hereto as Sealed Exhibit 1 is a true and correct copy of [REDACTED]

[REDACTED]

4. Attached hereto as Sealed Composite Exhibit 2 are true and correct copies of

[REDACTED].

5. Attached hereto as Sealed Exhibit 3 is a true and correct copy of [REDACTED]

[REDACTED]

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

/s/ Sigrid McCawley  
Sigrid McCawley, Esq.

Dated: October 14, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

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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 14th day of October, 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/ Sigrid S. McCawley  
Sigrid S. McCawley