

**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 REPLY  
IN SUPPORT OF PLAINTIFF'S MOTION TO COMPEL DATA FROM DEFENDANT'S  
UNDISCLOSED EMAIL ACCOUNT AND FOR AN ADVERSE INFERENCE  
INSTRUCTION**

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

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

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

3. Attached hereto as Exhibit 1 is a true and correct copy of August 9, 2016, Order.

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

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

[REDACTED]

6. Attached hereto as Sealed Exhibit 4 is a true and correct copy of [REDACTED]

[REDACTED]

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

/s/ Meredith Schultz  
Meredith Schultz, Esq.

Dated: October 28, 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 28th 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/ Meredith Schultz  
Meredith Schultz