

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  
RESPONSE IN OPPOSITION TO MOTION IN LIMINE TO EXCLUDE EXPERT  
TESTIMONY AND OPINIONS OF REBUTTAL EXPERT CHRIS ANDERSON**

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 Response In Opposition To Motion in Limine to Exclude Expert Testimony and Opinions of Rebuttal Expert Chris Anderson.
3. Attached hereto as Sealed Exhibit 1 is a true and correct copy of [REDACTED]  
[REDACTED]
4. Attached hereto as Sealed Exhibit 2 is a true and correct copy of [REDACTED]  
[REDACTED] Deposition of Chris Anderson.
5. Attached hereto as Sealed Exhibit 3 is a true and correct copy of [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/ Sigrid McCawley  
Sigrid McCawley, Esq.

Dated: January 31, 2017.

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 31st day of January, 2017, 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 McCawley  
Sigrid McCawley