

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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VIRGINIA L. GUIFFRE,

Plaintiff,

-against-

GHISLAINE MAXWELL,

Defendant.
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Case No.: 15-cv-7433 (RWS)

**DECLARATION OF JAY M. WOLMAN IN SUPPORT OF REPLY
TO PLAINTIFF’S OPPOSITION TO MOTION TO INTERVENE AND UNSEAL**

I, Jay M. Wolman, declare:

1. I am over the age of 18 years and am fully competent to make this Declaration. The facts set forth herein are within my personal knowledge and are true and correct.

2. I am an attorney duly licensed in the State of New York and admitted to practice before this Court. I am counsel of record for proposed intervenor Michael Cernovich in this matter, and I respectfully submit this Declaration in support the Reply to Plaintiff’s Opposition to Motion to Intervene and Unseal, filed herewith.

3. Attached hereto as Exhibit 1 is a true and correct copy the article: Gould, Martin, “EXCLUSIVE: Pedophile Jeffrey Epstein is accused of luring an underage girl into his elaborate sex trafficking enterprise under the guise of using his wealth and connections to get her into a prestige NYC college”, Daily Mail (Jan. 27, 2017), available at <<http://www.dailymail.co.uk/news/article-4164082/Pedophile-Jeffrey-Epstein-accused-new-sex-traffick-case.html>>

4. Attached hereto as Exhibit 2 is a true and correct copy of the article: “High-profile cases: Crimes that shook Palm Beach through the decades”, Palm Beach Daily News (Feb. 2, 2017), available at <<http://www.palmbeachdailynews.com/news/local/high-profile-cases-crimes-that-shook-palm-beach-through-the-decades/9B1wc5GHCMqHHUOeFotwBI/>>.

5. Attached hereto as Exhibit 3 is the cast list of the movie *Silenced: Our War on Free Speech* (Danger & Play Prods. 2016), as found at the URL: [<http://www.silencedmovie.com/category/cast-crew/>](http://www.silencedmovie.com/category/cast-crew/).

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

Executed on February 9, 2017.

/s/ Jay M. Wolman
Jay M. Wolman

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 9th day of February 2017, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that a true and correct copy of the foregoing document is being served via transmission of Notices of Electronic Filing generated by CM/ECF.

Respectfully submitted,

/s/ Jay M. Wolman
Jay M. Wolman