

**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 STAN POTTINGER IN SUPPORT OF  
MOTION FOR PROTECTIVE ORDER FOR NON PARTY WITNESS**

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

1. I am a lawyer and duly licensed to practice in New York 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 Motion for Protective Order for Non-Party Witness.

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

4. Attached hereto as Sealed Exhibit 2 are true and correct copies of [REDACTED]  
[REDACTED].

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

/s/ J. Stanley Pottinger

J. Stanley Pottinger, Esq.

*Counsel for Sarah Ransome*

Dated: February 22, 2017.

Respectfully Submitted,

By: /s/ J. Stanley Pottinger  
J. Stanley Pottinger  
*Counsel for Sarah Ransome*

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on the 22nd day of February 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.

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) 832-2628  
[lmessenger@hmflaw.com](mailto:lmessenger@hmflaw.com)  
[jpagliuca@hmflaw.com](mailto:jpagliuca@hmflaw.com)

Sigrid McCawley (Pro Hac Vice)  
Meredith Schultz (Pro Hac Vice)  
Boies Schiller & Flexner LLP  
401 E. Las Olas Blvd., Suite 1200  
Ft. Lauderdale, FL 33301  
Tel: (954) 356-0011  
Tel: (954) 356-0022  
[smccawley@bsflp.com](mailto:smccawley@bsflp.com)  
[mschultz@bsflp.com](mailto:mschultz@bsflp.com)

David Boies  
Boies Schiller & Flexner LLP  
333 Main Street  
Armonk, NY 10504  
[dboies@bsflp.com](mailto:dboies@bsflp.com)

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  
[brad@pathtojustice.com](mailto:brad@pathtojustice.com)

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>  
[cassellp@law.utah.edu](mailto:cassellp@law.utah.edu)

Peter Guirguis, Esq.  
MINTZ & GOLD, LLP  
600 Third Avenue  
New York, NY 10016  
(212) 696-4848  
[guirguis@mintzandgold.com](mailto:guirguis@mintzandgold.com)

/s/ J. Stanley Pottinger  
J. Stanley Pottinger, Esq.

---

<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.