

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

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

1. I am a Counsel 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 Renewed Motion to Compel Data From Defendant's Undisclosed Email Account And Motion for Adverse Inference Instruction.

3. Attached hereto as Sealed Composite Exhibit 1 is a true and correct copy of

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

[REDACTED]

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.

Dated: March 3, 2017.

/s/ Meredith Schultz

Meredith Schultz, Esq.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Meredith Schultz

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¹ 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 3rd day of March 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/ Meredith Schultz
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