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 MOTION TO PRESENT TESTIMONY FROM FOR PURPOSES OF OBTAINING AN ADVERSE INFERENCE INSTRUCTION

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 Motion to Present

Testimony of for Purposes of Obtaining an Adverse

Inference Instruction.

3. Attached hereto as Sealed Composite Exhibit 1 are true and correct copies of

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

<u>/s/ Sigrid McCawley</u> Sigrid McCawley, Esq.

Dated: March 3, 2017.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: <u>/s/ Sigrid McCawley</u> 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 (954) 356-0011

> David Boies Boies Schiller & Flexner LLP 333 Main Street Armonk, NY 10504

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

Paul G. Cassell (Pro Hac Vice) S.J. Quinney College of Law University of Utah 383 University St. Salt Lake City, UT 84112 (801) 585-5202¹

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.

Laura A. Menninger, Esq. Jeffrey Pagliuca, Esq. HADDON, MORGAN & FOREMAN, P.C. 150 East 10th Avenue Denver, Colorado 80203 Tel: (303) 831-7364 Fax: (303) 832-2628 Email: <u>lmenninger@hmflaw.com</u> jpagliuca@hmflaw.com

> /s/ Sigrid McCawley Sigrid McCawley