United States District Court Southern District of New York

| Virginia L. Giu | uffre, | |
|--|---------------------------------|---|
| | Plaintiff, | Case No.: 15-cv-07433-RWS |
| v . | | |
| Ghislaine Max | well, | |
| | Defendant. | |
| | / | |
| DECLARATION OF SIGRID MCCAWLEY IN SUPPORT OF PLAINTIFF'S RESPONSE IN OPPOSITION TO DEFENDANT 'S MOTION IN LIMINE TO EXCLUDE THE "BLACK BOOK" | | |
| I, Sign | rid McCawley, declare that the | e below is true and correct to the best of my |
| knowledge as f | follows: | |
| 1. | I am a Partner with the law fi | rm 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 Dec | claration in Support of Plaintiff's Response in |
| Opposition to Motion in Limine to Exclude the "Black Book". | | |
| 3. | Attached hereto as Sealed Ex | xhibit 1 is a true and correct copy of |
| | | |
| 4. | Attached hereto as Sealed Ex | hibit 2 are true and correct copies of |
| | | |
| | I declare under penalty of perj | jury that the foregoing is true and correct. |
| | | /s/ Sigrid McCawley Sigrid McCawley, Esq. |

Dated: March 15, 2017.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley
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 15th 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

Tel: (303) 831-7364 Fax: (303) 832-2628

Email: lmenninger@hmflaw.com
jpagliuca@hmflaw.com

/s/ Sigrid McCawley
Sigrid McCawley