

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 BRADLEY EDWARDS IN SUPPORT OF
PLAINTIFF'S RESPONSE IN OPPOSITION TO DEFENDANT'S MOTION IN LIMINE
TO EXCLUDE REFERENCES TO "CRIME VICTIMS' RIGHTS ACT" LITIGATION**

I, Bradley Edwards, 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 Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman 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 Opposition to Defendant's motion in limine to exclude references to "Crime Victims' Rights Act" Litigation.

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

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

[REDACTED] in the U.S. District Court for the Southern District of Florida action titled *Jane Does 1 and 2 v. United States of America*, No. 08-cv-80736.

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

[REDACTED] in the U.S. District Court for the Southern District

of Florida titled *Jane Does 1 and 2 v. United States of America*, No. 08-cv-80736.

6. Attached hereto as Sealed Exhibit 4 is a true and correct copy of the [REDACTED]
[REDACTED] in the U.S. District Court for the Southern District of New York action titled
Giuffre v. Maxwell, 15-cv-07433.

7. Attached hereto as Sealed Exhibit 5 is a true and correct copy of [REDACTED]
[REDACTED]

8. Attached hereto as Sealed Exhibit 6 is a true and correct copy of the [REDACTED]
[REDACTED]
[REDACTED]

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

/s/ Bradley Edwards
Bradley Edwards, Esq.

Dated: March 17, 2017.

Respectfully Submitted,

By: /s/ Bradley Edwards
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

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

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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 17th 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: lmenninger@hmflaw.com
jpagliuca@hmflaw.com

/s/ Bradley Edwards
Bradley Edwards

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.