

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
RESPONSE IN OPPOSITION TO DEFENDANT'S MOTION IN LIMINE TO PERMIT
QUESTIONING REGARDING PLAINTIFF'S SEXUAL HISTORY AND REPUTATION**

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 Response in Opposition to Defendant's Motion in Limine to Permit Questioning Regarding Plaintiff's Sexual History and Reputation.

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

[REDACTED]

[REDACTED]

[REDACTED]

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]

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

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

/s/ Meredith Schultz
Meredith Schultz, Esq.

Dated: March 17, 2017

Respectfully Submitted,
BOIES, SCHILLER & FLEXNER LLP

By: /s/ Meredith Schultz
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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.

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/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.