

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 REPLY IN SUPPORT OF MOTION TO PRESENT TESTIMONY FROM
SARAH KELLEN AND NADIA MARCINKOVA 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 Reply to Motion to Present Testimony of Sarah Kellen and Nadia Marcinkova for Purposes of Obtaining an Adverse Inference Instruction.

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

[REDACTED]

[REDACTED]

[REDACTED]

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

[REDACTED]

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

/s/ Sigrid McCawley
Sigrid McCawley, Esq.

Dated: March 23, 2017.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 23rd 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/ Sigrid McCawley
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