

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 EXCLUDE PHILIP BARDEN FROM TESTIFYING AT
TRIAL, TO EXCLUDE DEFENSES BASED UPON CERTAIN DOCUMENTS AND TO
EXCLUDE THEIR PRESENTATION AT TRIAL, FOR AN ADVERSE INFERENCE
JURY INSTRUCTION, AND FOR ATTORNEY'S FEES**

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 Exclude Philip Barden from Testifying at Trial, To Exclude Defenses Based upon Certain Documents and to Exclude Their Presentation at Trial, For an Adverse Inference Jury Instruction, and For Attorney's Fees.

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

[REDACTED].

4. Attached hereto as Sealed Composite Exhibit 2 are true and correct copies of

[REDACTED].

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

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

Dated: May 1, 2017.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley

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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.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 1st day of May 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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