

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 MOTION FOR ORDER TO SHOW CAUSE AND TO ENFORCE
COURT'S MARCH 22, 2017 ORDER PURSUANT TO FED. R. CIV. P. 37 (b)(2)(A)(vii)
AND FOR OTHER EXPEDITED RELIEF AT DEFENDANT'S THIRD DEPOSITION
ON MAY 11, 2017**

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 Motion for Order to Show Cause and to Enforce Court's March 22, 2017 Order Pursuant To Fed. R. Civ. P. 37 (b)(2)(A)(vii) And for Other Expedited Relief at Defendant's Third Deposition On May 11, 2017.

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

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

/s/ Meredith Schultz

Meredith Schultz, Esq.

Dated: May 5, 2017.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Meredith Schultz

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 5th 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/ Meredith Schultz
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