

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
VIRGINIA L. GIUFFRE,
Plaintiff,
v.
GHISLAINE MAXWELL,
Defendant.
-----X

15-cv-07433-RWS

**Declaration of Ty Gee in Support of Ms. Maxwell's Reply to Her
Motion for an Order to Show Cause re Protective Order**

I, Ty Gee, declare as follows:

1. I am an attorney at law duly licensed in the State of Colorado and admitted to practice in the United States District Court for the Southern District of New York *pro hac vice*. I am a member of the law firm Haddon, Morgan & Foreman, P.C., counsel of record for Defendant Ghislaine Maxwell ("Maxwell") in this action. I respectfully submit this declaration in support of Ms. Maxwell's Reply to Her Motion for an Order to Show Cause re Protective Order.

2. Attached as Exhibit E is a true and correct copy of excerpts from Ms. Guiffre's Redacted Plaintiff-Appellee Brief, *Giuffre v. Maxwell*, No. 16-3945 (2d Cir. Dec. 13, 2017)

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

Executed on December 18, 2018

s/ Ty Gee

CERTIFICATE OF SERVICE

I certify that on December 18, 2018, I electronically served this *Declaration Of Ty Gee In Support Of Ms. Maxwell's Reply to Her Motion for an Order to Show Cause re Protective Order* via ECF on the following:

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/s/ Nicole Simmons

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