

**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 S. McCawley IN SUPPORT OF PLAINTIFF VIRGINIA
GIUFFRE'S RESPONSE IN OPPOSITION TO DEFENDANT'S MOTION TO COMPEL
DEFENDANT'S FIRST SET OF DISCOVERY RESPONSES [D.E. 75]**

I, Sigrid S. 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 September 29, 2015 Order granting my Application to Appear Pro Hac Vice.

2. I respectfully submit this Declaration in support of Plaintiff Virginia Giuffre's Response in Opposition to Defendant's Motion to Compel Defendant's First Set of Discovery Responses [D.E. 75].

3. Attached hereto as Exhibit 1, is a true and correct copy of the March 24, 2016 Hearing Transcript before the Honorable District Court Judge Robert W. Sweet.

4. Attached hereto as Exhibit 2, is a true and correct copy of Defendant's Responses and Objections to Plaintiff's First Request for Production of Documents.

5. Attached hereto as Exhibit 3, is a true and correct copy of Sigrid McCawley's March 28, 2016 Correspondence.

6. Attached hereto as Exhibit 4, is a true and correct copy of GIUFFRE003714.

7. Attached hereto as Exhibit 5, is a true and correct copy of Virginia Giuffre's Identification Information for her Privilege Log ("Privilege Log Identities").

8. Attached hereto as Exhibit 6, is a true and correct copy of Judge Thomas Lynch's January 12, 2016 Protective Order.

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

/s/ Sigrid S. McCawley
Sigrid S. McCawley, Esq.

Dated: April 4, 2016

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 4, 2016, 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 this day on the individuals identified below via transmission of Notices of Electronic Filing generated by CM/ECF.

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/s/ Sigrid S. McCawley _____
Sigrid S. McCawley