

**United States District Court  
Southern District of New York**

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

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**DECLARATION OF SIGRID S. McCawley IN SUPPORT OF PLAINTIFF  
VIRGINIA GIUFFRE'S OPPOSITION TO DEFENDANT'S MOTION TO DISCLOSE  
CRIMINAL INVESTIGATION BY LAW ENFORCEMENT, OR IN THE  
ALTERNATIVE, TO STAY PROCEEDINGS**

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 Motion for Protective Order regarding Ms. Giuffre's Deposition.
3. Attached hereto as Exhibit 1, is a true and correct copy of the 2009 Notice of Taking Deposition of Ghislaine Maxwell, Subpoena, Cancellation Notice, and Daily Mail Article.
4. Attached hereto as Exhibit 2, is a true and correct copy of the April 13, 2016 Correspondence from Assistant U.S. Attorney Marie Villafaña to Laura Menninger.

5. Attached hereto as Exhibit 3, is a true and correct copy of the March 24, 2016 Hearing Transcript.

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

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

Dated: April 19, 2016

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 19, 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