

**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 BRIEF IN SUPPORT OF THE PRIVILEGE
CLAIMED FOR HER *IN-CAMERA* SUBMISSION**

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 Brief in Support Of The Privilege Claimed For Her *In-Camera* Submission.
3. Attached hereto as Exhibit 1, is a true and correct copy of LE000001-LE000002 from Ms. Giuffre's *in camera* submission.
4. Attached hereto as Exhibit 2, is a true and correct copy of 1 Modern New York Discovery § 23:38 (2d ed. updated through Aug. 2015).

5. Attached hereto as Exhibit 3, is a true and correct copy of 7 Carmody-Wait 2d, New York Practice § 42:178.

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

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

Dated: May 4, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 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
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