

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'S MOTION TO COMPEL DEFENDANT TO ANSWER
DEPOSITION QUESTIONS FILED UNDER SEAL**

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's Motion to Compel Defendant To Answer Deposition Questions Filed Under Seal.
3. Attached hereto as Exhibit 1, is a true and correct copy of page 21 of Defendant Maxwell's April 22, 2016 Deposition transcript.
4. Attached hereto as Exhibit 2, are true and correct copies of pages 19-22 of Defendant Maxwell's April 22, 2016 Deposition transcript.

5. Attached hereto as Exhibit 3, is a true and correct copy of the Palm Beach police report.

6. Attached hereto as Exhibit 4, are true and correct copies of pages 60-62 of Defendant Maxwell's April 22, 2016 Deposition transcript.

7. Attached hereto as Exhibit 5, is a true and correct copy of page 82 of Defendant Maxwell's April 22, 2016 Deposition transcript.

8. Attached hereto as Composite Exhibit 6, are true and correct copies of pages 52-55; 64-65; 82; 92-93; 137-38; 307-09 of Defendant Maxwell's April 22, 2016 Deposition transcript.

9. Attached hereto as Exhibit 7, is a true and correct copy of page 51 of Defendant Maxwell's April 22, 2016 Deposition transcript.

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




Sigrid S. McCawley, Esq.

Dated: May 5, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By:



Sigrid McCawley (Pro Hac Vice)
Boies, Schiller & Flexner LLP
401 E. Las Olas Blvd., Suite
1200 Ft. Lauderdale, FL 33301
(954) 356-0011

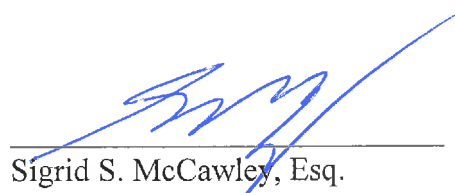
David Boies
Boies, Schiller & Flexner LLP
333 Main Street
Armonk, NY 10504

Ellen Brockman
Boies, Schiller & Flexner LLP
575 Lexington Ave
New York, New York 10022
(212) 446-2300

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 5, 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.

Laura A. Menninger, Esq.
Jeffrey Paliuca, Esq.
HADDON, MORGAN & FOREMAN, P.C.
150 East 10th Avenue
Denver, Colorado 80203
Tel: (303) 831-7364
Fax: (303) 832-2628
Email: lmenninger@hmflaw.com



Sigrid S. McCawley, Esq.