

**McCAWLEY DECLARATION**

**EXHIBIT 13**  
**(Filed Under Seal)**

***GIUFFRE***

***VS.***

***MAXWELL***

**Deposition**

***VIRGINIA GIUFFRE***

*05/03/2016*

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***Agren Blando Court Reporting & Video, Inc.***

*216 16th Street, Suite 600*

*Denver Colorado, 80202*

*303-296-0017*

1 Q Okay. And then the last -- the last  
2 document, I hope, is --

3 MS. MENNINGER: The big one.

4 (Exhibit 8 marked.)

5 Q (BY MS. MENNINGER) All right. Do you  
6 recognize -- I'm going to -- I'm sorry, if I didn't  
7 say it already. This is Defendant's Exhibit 8.

8 Do you recognize this document?

9 A Yes, I do.

10 Q And what is this document?

11 A This is a manuscript that I was writing, I  
12 believe, back in 2011 regarding some of my life  
13 story. And just to make it known, this is a based on  
14 true events. But I wouldn't say fictional, but just  
15 based on true events.

16 Not everything in it is -- not everything  
17 is in there and not everything is, you know, correct.  
18 So there's a few mistakes in there.

19 Q Okay. Off the top of your head, do you  
20 recall any mistakes that are in there now without  
21 reading the 140-page document?

22 MR. EDWARDS: We're going to be here a  
23 long time.

24 A Yeah, we could be here a very long time.  
25 I mean, I'd like to say a majority of it is correct.