

**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 PLAINTIFF'S RESPONSE IN
OPPOSITION TO DEFENDANT'S MOTION FOR DEFENDANT'S RULE 37(b) &(c)
SANCTIONS FOR FAILURE TO COMPLY WITH COURT ORDER AND FAILURE TO
COMPLY WITH RULE 26(a)**

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 Order granting my Application to Appear Pro Hac Vice.
2. I respectfully submit this Declaration in response to Defendant's Motion for Defendant's Rule 37(b) &(c) Sanctions for Failure to Comply with Court Order and Failure to Comply with Rule 26(a).
3. Attached hereto as Sealed Exhibit 1 is a true and correct copy of Excerpts from the May 18, 2016 Deposition of [REDACTED].
4. Attached hereto as Sealed Exhibit 2 is a true and correct copy of Excerpts from the

June 10, 2016 Deposition of [REDACTED].

5. Attached hereto as Sealed Exhibit 3 is a true and correct copy of Excerpts from the June 20, 2016 Deposition of [REDACTED].

6. Attached hereto as Sealed Exhibit 4 is a true and correct copy of Excerpts from the June 21, 2016 Deposition of Joseph Recarey.

7. Attached hereto as Sealed Composite Exhibit 5 is a true and correct copy of E-mail Correspondences to Laura Menninger.

8. Attached hereto as Sealed Composite Exhibit 6 is a true and correct copy of Medical Release Letter to Providers.

9. Attached hereto as Sealed Composite Exhibit 7 is a true and correct copy of April 29, 2016 Signed Medical Releases to Opposing Counsel.

10. Attached hereto as Sealed Exhibit 8 is a true and correct copy of Judith Lightfoot's Redacted Medical Release (Giuffre005431-005438).

11. Attached hereto as Sealed Exhibit 9, is a true and correct copy of Excerpts from the June 24, 2016 Deposition of [REDACTED].

12. Attached hereto as Sealed Exhibit 10 is a true and correct copy of Excerpt from the May 26, 2016 Confidential Deposition of Dr. Steven Olson.

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

/s/ Sigrid McCawley
Sigrid McCawley

Dated: June 28, 2016

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 28, 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 to all parties of record via transmission of the Electronic Court Filing System generated by CM/ECF.

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/s/ Sigrid S. McCawley
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