

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.



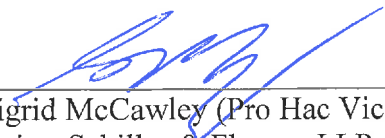
Sigrid S. McCawley, Esq.

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.