

**United States District Court
Southern District of New York**

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

**NON-REDACTED DECLARATION OF SIGRID S. MCCAWLEY IN SUPPORT OF
PLAINTIFF VIRGINIA GIUFFRE'S RESPONSE TO MOTION TO COMPEL
ATTORNEY-CLIENT COMMUNICATIONS AND ATTORNEY WORK PRODUCT
MATERIALS**

I, Sigrid S. McCawley, declare that the below is true and correct to the best of my knowledge as follows:

1. I am an associate 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 support of Plaintiff Virginia Giuffre's Response in Opposition to Defendant's Motion to Compel Attorney Client Communications and Attorney Work Product Materials.

3. Attached hereto as Exhibit 1, is a true and correct copy of Emergency Petition (CVRA Complaint) filed in Jane Doe 1 v. United States, No. 9:08-cv-80736 (S.D. Fla. July 7, 2008).

4. Attached hereto as Exhibit 2, is a true and correct copy of the Jane Does' 3 and 4 Corrected Joinder Motion (filed under seal).
5. Attached hereto as Exhibit 3, Response to Motion to Intervene (filed under seal).
6. Attached hereto as Exhibit 4, Order denying Jane Doe 3's motion to join.
7. Attached hereto as Exhibit 5, is a true and correct copy of the Complaint in Edwards and Cassell v. Dershowitz.
8. Attached hereto as Exhibit 6 is a true and correct copy of Motion to Compel.
9. Attached hereto as Exhibit 7 is a true and correct copy of Response in Opposition to Motion to Compel.
10. Attached hereto as Exhibit 8 is a true and correct copy of Reply in Support of Motion to Compel.
11. Attached hereto as Exhibit 9 is a true and correct copy of Sur-Reply in Support Opposition to Motion to Compel
12. Attached hereto as Exhibit 10 is a true and correct copy of Order Denying Motion to Compel.
13. Attached hereto as Exhibit 11 is a true and correct copy of Composite Exhibit of Deposition Excerpts from the Deposition of Virginia Giuffre, at 22-23, 131-32; 173-74; 183; 200-12 (filed under seal).
14. Attached hereto as Exhibit 12 is a true and correct copy of Notice of Withdrawal of Summary Judgment Motion.
15. Attached hereto as Exhibit 13 is a true and correct copy of Affidavit of Ms. Giuffre (May 30, 2016).

16. Attached hereto as Exhibit 14 is a true and correct copy of Deposition excerpt of Paul Cassell, Volume I, dated Oct. 16, 2015, at 39:24 – 40:2.

17. Attached hereto as Exhibit 15 is a true and correct copy of Transcript of Scarola/Edwards interview on April 7, 2011.

18. Attached hereto as Exhibit 16 is a true and correct copy of Common interest agreement.

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

/s/ Sigrid McCawley
Sigrid McCawley

Dated: June 1, 2016

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley
Sigrid McCawley (Pro Hac Vice)
Meredith Schultz (Pro Hac Vice)
Boies, Schiller & Flexner LLP
401 E. Las Olas Blvd., Suite 1200
Ft. Lauderdale, FL 33301
Tel: (954) 356-0011
Email: smccawley@bsfllp.com

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

Paul G. Cassell (Pro Hac Vice)
Ronald N. Boyce Presidential Professor of
Criminal Law
S.J. Quinney College of Law at the
University of Utah
383 S. University St.
Salt Lake City, UT 84112-0730
(801) 585-5202 (phone)
(801) 585-2750 (fax)
Email: cassellp@law.utah.edu

Bradley Edwards (Pro Hac Vice)
Farmer, Jaffe, Weissing, Edwards,
Fistos & Lehrman, P.L.
425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301
Tel: (954) 524-2820
Fax: (954) 524-2822
Email: brad@pathtojustice.com

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.

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](mailto:lmenninger@hmflaw.com)

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