

**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 MCCAWLEY IN SUPPORT OF PLAINTIFF'S MOTION
TO COMPEL DATA FROM DEFENDANT'S UNDISCLOSED EMAIL ACCOUNT AND
FOR AN ADVERSE INFERENCE INSTRUCTION**

I, Sigrid 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 Support of Plaintiff's Motion to Compel Data from Defendant's Undisclosed Email Account and for Adverse Inference Instruction.
3. Attached hereto as Sealed Exhibit 1 is a true and correct copy of Excerpts from June 1, 2016, Deposition of Juan Alessi.
4. Attached hereto as Sealed Composite Exhibit 2 are true and correct copies of [REDACTED].
5. Attached hereto as Sealed Exhibit 3 is a true and correct copy of Excerpts from April 22, 2016 Deposition of Ghislaine Maxwell.

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

/s/ Sigrid McCawley
Sigrid McCawley, Esq.

Dated: October 14, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid S. McCawley
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 14th day of October, 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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