

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

I, Meredith Schultz, 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's Reply In Support of Motion to Compel Data from Defendant's Undisclosed Email Account and for an Adverse Inference Instruction.
3. Attached hereto as Exhibit 1 is a true and correct copy of August 9, 2016, Order.
4. Attached hereto as Sealed Exhibit 2 is a true and correct copy of September 23, 2016, Transmittal Email serving Laura Menninger.
5. Attached here to as Sealed Exhibit 3 is a true and correct copy of a September 23,

2016, Correspondence to Laura Menninger.

6. Attached hereto as Sealed Exhibit 4 is a true and correct copy of October 17,

2016, Correspondence from Laura Menninger.

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

/s/ Meredith Schultz  
Meredith Schultz, Esq.

Dated: October 28, 2016.

Respectfully Submitted,  
BOIES, SCHILLER & FLEXNER LLP

By: /s/ Meredith Schultz  
Sigrid S. McCawley (Pro Hac Vice)  
Meredith Schultz (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

Bradley J. Edwards (Pro Hac Vice)  
FARMER, JAFFE, WEISSING,  
EDWARDS, FISTOS & LEHRMAN, P.L.  
425 North Andrews Avenue, Suite 2  
Fort Lauderdale, Florida 33301  
(954) 524-2820

Paul G. Cassell (Pro Hac Vice)  
S.J. Quinney College of Law  
University of Utah  
383 University St.  
Salt Lake City, UT 84112

(801) 585-5202<sup>1</sup>

---

<sup>1</sup> This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah for this private representation.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 28th 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.

Laura A. Menninger, Esq.  
Jeffrey Pagliuca, 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)  
[jpagliuca@hmflaw.com](mailto:jpagliuca@hmflaw.com)

/s/ Meredith Schultz  
Meredith Schultz