

**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 ENFORCE THE COURT'S ORDER AND DIRECT
DEFENDANT TO ANSWER DEPOSITION QUESTIONS**

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 Enforce the Court's Order and Direct Defendant to Answer Deposition Questions.

3. Attached hereto as Sealed Composite Exhibit 1 is a true and correct copy of Excerpt from April 22, 2016, Deposition of Ghislaine Maxwell.

4. Attached hereto as Sealed Exhibit 2 is a true and correct copy of June 20, 2016 Sealed Court Order.

5. Attached hereto as Sealed Composite Exhibit 3 is a true and correct copy of Excerpt from June 22, 2016, Deposition of Ghislaine Maxwell.

6. Attached hereto as Sealed Exhibit 4 is a true and correct copy of Excerpts from

June 24, 2016 Deposition of Tony Figueroa.

7. Attached hereto as Sealed Exhibit 5 is a true and correct copy of Excerpts from May 18, 2016, Deposition of Johanna Sjoberg.

8. Attached hereto as Sealed Exhibit 6 is a true and correct copy of Excerpts from June 10, 2016, Deposition of Rinaldo Rizzo.

9. Attached hereto as Sealed Exhibit 7 is a true and correct copy of Excerpts from June 1, 2016, Deposition of Juan Alessi.

10. Attached hereto as Sealed Exhibit 8 is a true and correct copy of Excerpts from May 24, 2016, Deposition of Lynn Trude Miller.

11. Attached hereto as Sealed Exhibit 9 are true and correct copies of flight logs excerpted Rodgers Dep. Ex. 1.

12. Attached hereto as Sealed Exhibit 10 is a true and correct copy of January 22, 2015 *Dailymail.co* article "All aboard The Lolita Express": Flight Logs.

13. Attached hereto as Sealed Exhibit 11 is a true and correct copy of Excerpts from June 21, 2016, Deposition of Detective Joseph Recarey.

14. Attached hereto as Sealed Exhibit 12 is a true and correct copy of Excerpts from October 20, 2009, Deposition of Louella Rabuyo.

15. Attached hereto as Sealed Exhibit 13 is a true and correct copy of Excerpts from June 3, 2016, Deposition of David Rodgers.

16. Attached hereto as Sealed Exhibit 14 is a true and correct copy of Excerpts from March 24, 2010, Deposition of Sarah Kellen.

17. Attached hereto as Sealed Exhibit 15 is a true and correct copy of Excerpts from April 13, 2010, Deposition of Nadia Marcinkova.

18. Attached hereto as Sealed Exhibit 16 is a true and correct copy of Excerpts from July 29, 2009, Deposition of Alfredo Rodriguez.

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

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

Dated: August 12, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid S. McCawley
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) 585-5202¹

¹ 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 12th day of August, 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
jpagliuca@hmflaw.com

/s/ Sigrid S. McCawley
Sigrid S. McCawley