

**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 REPLY IN SUPPORT OF HER 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 Reply in Support of her Motion to Compel Defendant To Answer Deposition Questions Filed Under Seal.
3. Attached hereto as Exhibit 1, is a true and correct copy of Excerpts from the April 22, 2016 Deposition Transcript of Ghislaine Maxwell.
4. Attached hereto as Composite Exhibit 2, are true and correct copies of the Flight Logs of Jeffrey Epstein's private planes and summary charts.
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 Excerpts from the July 29, 2009 Deposition Transcript of Alfredo Rodriguez.

7. Attached hereto as Exhibit 5, is a true and correct copy of Excerpts from Juan Alessi's November 21, 2005 Sworn Statement.

8. Attached hereto as Exhibit 6, is a true and correct copy of Excerpts from the September 8, 2009 Deposition Transcript of Juan Alessi.

9. Attached hereto as Exhibit 7, is a true and correct copy of Excerpts from the August 7, 2009 Deposition Transcript 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: May 11, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley

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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 May 11, 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.

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/s/ Sigrid S. McCawley
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