

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

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

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**DECLARATION OF SIGRID S. McCAWLEY IN SUPPORT OF  
PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO STAY**

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 Virginia Giuffre's Opposition to Defendant Maxwell's Motion to Stay.

3. Attached hereto as Exhibit 1, is a true and correct copy of the Government's September 3, 2008 Victim Notification Letter.

4. Attached hereto as Composite Exhibit 2, is a true and correct copy of flight logs for Jeffrey Epstein's private jet, and a summary chart reflecting flights where Ms. Giuffre and Defendant were listed as passengers, and a chart listing the airport codes.

5. Attached hereto as Exhibit 3, is a true and correct copy of a picture of Prince Andrew, Ghislaine Maxwell and Virginia Roberts Giuffre.

6. Attached hereto as Exhibit 4, is a true and correct copy of Excerpts from the July 29, 2009 and August 7, 2009 Deposition Transcripts of Alfredo Rodriguez.

7. Attached hereto as Composite Exhibit 5, is a true and correct copy of the Palm Beach Police Reports dated March 14, 2005 and July 28, 2006.

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 Juan Alessi's November 21, 2005 Sworn Statement.

10. Attached hereto as Composite Exhibit 8, is a true and correct copy of the Notice of Deposition of Ghislaine Maxwell, Subpoena and Cancellation Payment Notice, and January 13, 2015 Daily Mail, "*Bill Clinton pictured with Jeffrey Epstein's social fixer at Chelsea's wedding AFTER severing links with disgraced pedophile.*"

11. Attached hereto as Exhibit 9, is a true and correct copy of Plaintiff's First Request for Production of Documents to Defendant, dated October 27, 2015.

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

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

Dated: December 10, 2015

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on December 10, 2015, 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  
Sigrid S. McCawley