

**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. McCRAWLEY IN SUPPORT OF PLAINTIFF VIRGINIA
GIUFFRE'S RESPONSE IN OPPOSITION TO DEFENDANT'S MOTION FOR
PROTECTIVE ORDER REGARDING DEFENDANT'S DEPOSITION**

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 Response in Opposition to Defendant's Motion for Protective Order Regarding Defendant's Deposition [D.E. 63].
3. Attached hereto as Exhibit 1, is a true and correct copy of Sigrid McCawley's March 22, 2016 Correspondence.
4. Attached hereto as Exhibit 2, is a true and correct copy of Plaintiff's Supplemental Responses and Objections to Defendant's First Set of Discovery Requests.
5. Attached hereto as Exhibit 3, is a true and correct copy of Plaintiff's original Responses and Objections to Defendant's First Set of Discovery Requests dated March 16, 2016.

6. Attached hereto as Exhibit 4, is a true and correct copy of the Affidavit of Robert Conley from Rational Retention.

7. Attached hereto as Exhibit 5, is a true and correct copy of Sigrid McCawley's March 20, 2016 Correspondence to Defendant's Counsel.

8. Attached hereto as Exhibit 6, is a true and correct copy of Sigrid McCawley's February 19, 2016 Correspondence to Defendant's Counsel.

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

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

Dated: March 23, 2016

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 23, 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 _____
Sigrid S. McCawley