

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

I, Sigrid 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 Order granting my Application to Appear Pro Hac Vice.
2. I respectfully submit this Declaration in Support of Plaintiff's Motion to Compel Data from Defendant's Undisclosed Email Account and for Adverse Inference Instruction.
3. Attached hereto as Sealed Exhibit 1 is a true and correct copy of Excerpts from June 1, 2016, Deposition of Juan Alessi.
4. Attached hereto as Sealed Composite Exhibit 2 are true and correct copies of Excerpts from February 16, 2010 Deposition of Janusz Banasiak.
5. Attached hereto as Sealed Exhibit 3 is a true and correct copy of Excerpts from April 22, 2016 Deposition of Ghislaine Maxwell.

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

/s/ Sigrid McCawley
Sigrid McCawley, Esq.

Dated: October 14, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid S. 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 the 14th 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.

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/s/ Sigrid S. McCawley
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