

**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 RESPONSE IN OPPOSITION TO DEFENDANT'S MOTION FOR  
PROTECTIVE ORDER REGARDING FINANCIAL INFORMATION**

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 Response in Opposition to Defendant's Motion for Protective Order Regarding Financial Information.

3. Attached hereto as Sealed Composite Exhibit 1 is a true and correct copy of Excerpts from May 18, 2016, Deposition of Johanna Sjoberg.

4. Attached hereto as Sealed Composite Exhibit 2 is a true and correct copy of Excerpts from June 10, 2016, Deposition of Rinaldo Rizzo.

5. Attached hereto as Sealed Composite Exhibit 3 is a true and correct copy of Excerpts from June 1, 2016, Deposition of Juan Alessi.

6. Attached hereto as Sealed Composite Exhibit 4 is a true and correct copy of Excerpts from June 24, 2016 Deposition of Tony Figueroa.

7. Attached hereto as Sealed Composite Exhibit 5 is a true and correct copy of Excerpts from June 21, 2016, Deposition of Detective Joseph Recarey and June 3, 2016, Deposition of David Rodgers.

8. Attached hereto as Sealed Exhibit 6 is a true and correct copy of Excerpts from June 3, 2016, Deposition of David Rodgers Exhibit 1.

9. Attached hereto as Sealed Exhibit 7 is a true and correct copy of Excerpts from April 22, 2016, Deposition of Ghislaine Maxwell.

10. Attached hereto as Sealed Exhibit 8 is a true and correct copy of November 10, 2015 Correspondence from Ross Gow to Ghislaine Maxwell.

11. Attached here to as Sealed Composite Exhibit 9 are true copies of Ellmax, LLC and The TerraMar Project Subpoenas.

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

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

Dated: August 22, 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) 585-5202<sup>1</sup>

---

<sup>1</sup> 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 22<sup>nd</sup> 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 10<sup>th</sup> Avenue  
Denver, Colorado 80203  
Tel: (303) 831-7364  
Fax: (303) 832-2628  
Email: [lmenninger@hmflaw.com](mailto:lmenninger@hmflaw.com)  
[jpagliuca@hmflaw.com](mailto:jpagliuca@hmflaw.com)

/s/ Sigrid S. McCawley  
Sigrid S. McCawley