

**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 PLAINTIFF'S RESPONSE IN  
OPPOSITION TO DEFENDANT'S MOTION FOR DEFENDANT'S RULE 37(b) &(c)  
SANCTIONS FOR FAILURE TO COMPLY WITH COURT ORDER AND FAILURE TO  
COMPLY WITH RULE 26(a)**

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 Order granting my Application to Appear Pro Hac Vice.
2. I respectfully submit this Declaration in response to Defendant's Motion for Defendant's Rule 37(b) &(c) Sanctions for Failure to Comply with Court Order and Failure to Comply with Rule 26(a).
3. Attached hereto as Sealed Exhibit 1 is a true and correct copy of Excerpts from the May 18, 2016 Deposition of Rinaldo Rizzo.
4. Attached hereto as Sealed Exhibit 2 is a true and correct copy of Excerpts from the

June 10, 2016 Deposition of Johanna Sjoberg.

5. Attached hereto as Sealed Exhibit 3 is a true and correct copy of Excerpts from the

June 20, 2016 Deposition of [REDACTED]

6. Attached hereto as Sealed Exhibit 4 is a true and correct copy of Excerpts from the

June 21, 2016 Deposition of Joseph Recarey.

7. Attached hereto as Sealed Composite Exhibit 5 is a true and correct copy of E-mail

Correspondences to Laura Menninger.

8. Attached hereto as Sealed Composite Exhibit 6 is a true and correct copy of

Medical Release Letter to Providers.

9. Attached hereto as Sealed Composite Exhibit 7 is a true and correct copy of April

29, 2016 Signed Medical Releases to Opposing Counsel.

10. Attached hereto as Sealed Exhibit 8 is a true and correct copy of Judith Lightfoot's

Redacted Medical Release (Giuffre005431-005438).

11. Attached hereto as Sealed Exhibit 9, is a true and correct copy of Excerpts from

the June 24, 2016 Deposition of Tony Figueroa.

12. Attached hereto as Sealed Exhibit 10 is a true and correct copy of Excerpt from the

May 26, 2016 Confidential Deposition of Dr. Steven Olson.

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

/s/ Sigrid McCawley  
Sigrid McCawley

Dated: June 28, 2016

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley  
Sigrid McCawley (Pro Hac Vice)  
Meredith Schultz (Pro Hac Vice)  
Boies, Schiller & Flexner LLP  
401 E. Las Olas Blvd., Suite 1200  
Ft. Lauderdale, FL 33301  
Tel: (954) 356-0011  
Email: smccawley@bsfllp.com

David Boies  
Boies, Schiller & Flexner LLP  
333 Main Street  
Armonk, NY 10504

Paul G. Cassell (Pro Hac Vice)  
Ronald N. Boyce Presidential Professor of  
Criminal Law  
S.J. Quinney College of Law at the  
University of Utah  
383 S. University St.  
Salt Lake City, UT 84112-0730  
(801) 585-5202 (phone)  
(801) 585-2750 (fax)  
Email: cassellp@law.utah.edu

Bradley Edwards (Pro Hac Vice)  
Farmer, Jaffe, Weissing, Edwards,  
Fistos & Lehrman, P.L.  
425 North Andrews Avenue, Suite 2  
Fort Lauderdale, Florida 33301  
Tel: (954) 524-2820  
Fax: (954) 524-2822  
Email: brad@pathtojustice.com

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on June 28, 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 Paliuca, 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)

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