

**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 TO DEFENDANT'S MOTION FOR SUMMARY
JUDGMENT AND UNDISPUTED FACTS**

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 to Defendant's Motion for Summary Judgment and Undisputed Facts.
3. Attached hereto as Sealed Exhibit 1 are true and correct copies of Excerpts from June 1, 2016 Depositions of Juan Alessi.
4. Attached here to as Sealed Exhibit 2 is a true and correct copy of Excerpts from June 23, 2016, Deposition of James Austrich.
5. Attached hereto as Sealed Exhibit 3 is a true and correct copy of Excerpts from September 9, 2016, Deposition of Jeffrey Epstein.
6. Attached hereto as Sealed Exhibit 4 is a true and correct copy of Excerpts from June 24, 2016, Deposition of Tony Figueroa (Volumes I and II).

7. Attached hereto as Sealed Composite Exhibit 5 are true and correct copies of Excerpts from May 3, 2016 and November 14, 2016, Deposition of Virginia Giuffre.

8. Attached hereto as Sealed Exhibit 6 is a true and correct copy of Excerpts from November 18, 2016, Deposition of Ross Gow.

9. Attached hereto as Sealed Exhibit 7 is a true and correct copy of Excerpts from June 20, 2016, Deposition of [REDACTED].

10. Attached hereto as Sealed Exhibit 8 is a true and correct copy of Excerpts from January 25, 2017, Deposition of Sarah Kellen.

11. Attached hereto as Sealed Exhibit 9 is a true and correct copy of Excerpts from November 29, 2016, Deposition of Peter Kent.

12. Attached hereto as Sealed Exhibit 10 is a true and correct copy of Excerpts from January 17, 2017, Deposition of Nadia Marcinko.

13. Attached hereto as Sealed Composite Exhibit 11 are true and correct copies of Excerpts from April 22, 2016 and July 22, 2016, Depositions of Ghislaine Maxwell.

14. Attached hereto as Sealed Exhibit 12 is a true and correct copy of Excerpts from May 24, 2016, Deposition of Lynne Trudy Miller

15. Attached hereto as Sealed Exhibit 13 is a true and correct copy of Excerpts from June 21, 2016, Deposition Joseph Recarey.

16. Attached hereto as Sealed Exhibit 14 is a true and correct copy of Excerpts from June 10, 2016, Deposition of Rinaldo Rizzo.

17. Attached hereto as Sealed Exhibit 15 is a true and correct copy of Excerpts from June 3, 2016, Deposition of David Rodgers.

18. Attached hereto as Sealed Exhibit 16 is a true and correct copy of Excerpts from May 18, 2016, Deposition of Johanna Sjoberg.

19. Attached hereto as Sealed Exhibit 17 is a true and correct copy of Excerpts from May 20, 2016, Deposition of Sky Roberts.

20. Attached hereto as Sealed Composite Exhibit 18 are true and correct copies of Excerpts from September 8, 2009, Depositions of Juan Alessi (GIUFFRE000102-000103; GIUFFRE000105; GIUFFRE000241-000242).

21. Attached hereto as Sealed Exhibit 19 is a true and correct copy of Excerpts from February 16, 2010, Deposition of Janusz Banasiak (GIUFFRE004431-004432; GIUFFRE004437-004438; GIUFFRE004477).

22. Attached hereto as Sealed Exhibit 20 is a true and correct copy of Excerpts from October 20, 2009, Deposition of Louella Rabuyo (GIUFFRE004386).

23. Attached hereto as Sealed Composite Exhibit 21 is a true and correct copy of Excerpts from July 29, 2009 and August 7, 2009, Deposition of Alfredo Rodriguez (GIUFFRE000936-000937; GIUFFRE000942; GIUFFRE000953-000954; GIUFFRE000974; GIUFFRE000978; GIUFFRE000996; GIUFFRE000999-001000; GIUFFRE001003).

24. Attached hereto as Sealed Exhibit 22 is a true and correct copy of August 1, 2016, Defendant's Privilege Log.

25. Attached hereto as Sealed Exhibit 23 is a true and correct copy of September 15, 2016, Expert Report of Professor Terry Coonan.

26. Attached hereto as Sealed Exhibit 24 is a true and correct copy of September 15, 2016, Expert Report of Doctor Bernard Jansen.

27. Attached hereto as Sealed Exhibit 25 is a true and correct copy of November 28, 2016, Expert Report of Peter Kent

28. Attached hereto as Sealed Exhibit 26 is a true and correct copy of January 2, 2015, Email Correspondence (GM_00068).

29. Attached hereto as Sealed Exhibit 27 is a true and correct copy of Excerpts of Palm Beach School County Records (GM_00888-00898).

30. Attached hereto as Sealed Exhibit 28 is a true and correct copy of Excerpts of Message Pads (GIUFFRE001388; GIUFFRE001409; GIUFFRE001412-4213; GIUFFRE001417-18, GIUFFRE001421; GIUFFRE001423; GIUFFRE001426-1428; GIUFFRE001432-1433; GIUFFRE001435; GIUFFRE001446; GIUFFRE001448-1449; GIUFFRE001452-1454; GIUFFRE001456; GIUFFRE001462; GIUFFRE001474; GIUFFRE001563).

31. Attached here to as Sealed Exhibit 29 is a true and correct copy of Epstein's Black Book (GIUFFRE001573-GIUFFRE001669).

32. Attached hereto as Sealed Exhibit 30 is a true and correct copy of September 3, 2008, U.S. Attorney Victim Notification Letter (GIUFFRE002216-002218).

33. Attached hereto as Sealed Exhibit 31 is a true and correct copy of July 5, 2013, Federal Bureau of Investigation Interview (GIUFFRE001235-001246).

34. Attached hereto as Sealed Exhibit 32 is a true and correct copy of Handwritten Note from Defendant. (GIUFFRE003191-003192).

35. Attached hereto as Sealed Exhibit 33 is a true and correct copy of July 2001 New York Presbyterian Hospital Records (GIUFFRE003258-003290).

36. Attached hereto as Sealed Exhibit 34 is a true and correct copy of a February 17, 2011, Email Correspondence to Sharon Churcher (GIUFFRE003678).

37. Attached hereto as Sealed Exhibit 35 is a true and correct copy of February 13, 2011, Email Correspondence to Sharon Churcher (GIUFFRE003690).

38. Attached hereto as Sealed Exhibit 36 is a true and correct copy of February 25, 2011, Email Correspondence to Sharon Churcher (GIUFFRE003731.)

39. Attached hereto as Exhibit 37 is a true and correct copy of a Passport Application

(GIUFFRE004721).

40. Attached hereto as Sealed Exhibit 38 is a true and correct copy of Judith Lightfoot Psychological Records (GIUFFRE005431-005438).

41. Attached hereto as Sealed Exhibit 39 is a true and correct copy of July 25, 2006, Palm Beach Police Department Incident Report (GIUFFRE005614-005700).

42. Attached hereto as Sealed Exhibit 40 is a true and correct copy of an Amazon Receipt (GIUFFRE006581).

43. Attached hereto as Sealed Exhibit 41 is a true and correct copy of David Rodger's June 3, 2016, Deposition Exhibit 1, Flight Log, (GIUFFRE007055-007161).

44. Attached hereto as Sealed Exhibit 42 are true and correct copies of Photographs (GIUFFRE007162-7182).

45. Attached hereto as Sealed Exhibit 43 is a true and correct copy of Travel Documents to Thailand (GIUFFRE007411-GIUFFRE007432).

46. Attached hereto as Sealed Exhibit 44 is a true and correct copy of Walkthrough Video CD (GIUFFRE007584).

47. Attached hereto as Sealed Exhibit 45 is a true and correct copy of West Palm Beach Contact List (GIUFFRE007834-GIUFFRE007847).

48. Attached hereto as Sealed Exhibit 46 is a true and correct copy of October 23, 2016, Social Security Administration records (GIUFFRE009176-GIUFFRE009179).

49. Attached hereto as Sealed Exhibit 47 is a true and correct copy of November 7, 2016, Employment Records from Courtyard Animal Hospital (GIUFFRE009203).

50. Attached hereto as Sealed Exhibit 48 is a true and correct copy of January 2, 2015, Email Correspondence (RG (UK) _000009).

51. Attached hereto as Sealed Exhibit 49 are true and correct copies of Termination

Documents (MAR-A-LAGO 0173 & MAR-A-LAGO 0176).

52. Attached hereto as Sealed Exhibit 50 is a true and correct copy of January 2, 2015, Joinder Motion (GIUFFRE000319-000333).

53. Attached hereto as Sealed Exhibit 51 is a true and correct copy of Virginia Roberts Driver License (GIUFFRE009209).

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

/s/ Sigrid McCawley
Sigrid McCawley, Esq.

Dated: January 31, 2017.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid 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 31st day of January, 2017, 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 McCawley
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