United States District Court Southern District of New York

Virginia L. Giuffr	e,
--------------------	----

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

<u>CORRECTED¹ DECLARATION OF SIGRID S. McCAWLEY IN SUPPORT OF</u> <u>PLAINTIFF'S REPLY TO MOTION TO EXCEED PRESUMPTIVE TEN DEPOSITION</u> <u>LIMIT</u>

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's Reply to Motion to

Exceed Presumptive Ten Deposition Limit.

3. Attached hereto as Exhibit 1 is a true and correct copy of Johanna Sjoberg's

Deposition Transcript excerpts dated May 18, 2016.

4. Attached hereto as Exhibit 2 is a true and correct copy of Rinaldo Rizzo's **<u>Final</u>**

Deposition Transcript excerpts dated June 10, 2016.

¹ On June 13, 2016, Ms. Giuffre filed her Reply in Support of her Motion to Exceed the Presumptive Ten Deposition Limit (DE 203). This brief contained excerpts from Rinaldo Rizzo's "rough" deposition transcript, as the final transcript had not yet been completed by the stenographer. On June 14, 2016, the stenographer issued the "final" deposition transcript, and Ms. Giuffre hereby files the final transcript citations and excerpts to replace the "rough" transcript that accompanied her supporting Declaration (DE 204-2). There are no other changes to this document.

5. Attached hereto as Exhibit 3 is a true and correct copy of Juan Alessi's

Deposition Transcript excerpts dated June 1, 2016.

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

<u>/s/ Sigrid S. McCawley</u> Sigrid S. McCawley, Esq. Dated: June 14, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: <u>/s/ Sigrid McCawley</u> 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 (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) 585-5202²

² 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 June, 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.

Laura A. Menninger, Esq. Jeffrey Pagliuca, Esq. HADDON, MORGAN & FOREMAN, P.C. 150 East 10th Avenue Denver, Colorado 80203 Tel: (303) 831-7364 Fax: (303) 832-2628 Email: <u>lmenninger@hmflaw.com</u> jpagliuca@hmflaw.com

> /s/ Sigrid S. McCawley Sigrid S. McCawley