

**United States District Court  
Southern District of New York**

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

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**DECLARATION OF MEREDITH SCHULTZ IN SUPPORT OF PLAINTIFF'S  
RESPONSE IN OPPOSITION TO DEFENDANT'S MOTION FOR SANCTIONS**

I, Meredith Schultz, declare that the below is true and correct to the best of my knowledge as follows:

1. I am an associate 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 Sanctions.

3. Attached hereto as Sealed Exhibit 1 is a true and correct copy of September 2, 2008, Victim Notification Letter (GIUFFRE001203-GIUFFRE001205).

4. Attached hereto as Sealed Exhibit 2 is a true and correct copy of Excerpts of January 16 2016, Deposition of Virginia Giuffre.

5. Attached here to as Sealed Exhibit 3 is a true and correct copy of Excerpts from May 3, 2016, Deposition of Virginia Giuffre.

6. Attached hereto as Sealed Exhibit 4 is a true and correct copy of June 9, 2011 Records from Dr. Judith Lightfoot (GUIFFRE005437).

7. Attached hereto as Sealed Exhibit 5 is a true and correct copy of Excerpts from October 2009, Deposition of Louella Rabuyo.

8. Attached hereto as Sealed Composite Exhibit 6 are true and correct copies of Palm Beach Police Report (GIUFFRE000064) and Excerpts from June 21, 2016 Deposition of Detective Joseph Recarey.

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

/s/ Meredith Schultz  
Meredith Schultz, Esq.

Dated: December 16, 2016.

Respectfully Submitted,

By: /s/ Meredith Schultz  
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<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 16th day of December, 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/ Meredith Schultz  
Meredith Schultz