

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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VIRGINIA L. GIUFFRE,

Plaintiff,

v.

**15-cv-07433-RWS**

GHISLAINE MAXWELL,

Defendant.

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**Declaration of** [REDACTED]

I, [REDACTED], declare as follows:

1. I am an attorney at law duly licensed in the State of Massachusetts.
2. I have provided legal representation to [REDACTED] as to specific past and ongoing legal matters both before and after April 2015. I regularly communicated with [REDACTED] [REDACTED] regarding my legal representation of [REDACTED] via email with the intention that such email communications remain confidential and privileged. As counsel for [REDACTED], I intended all my emails to [REDACTED] to be kept confidential, regularly marking the communications "Attorney-Client Privilege".

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

Executed on August 17, 2016.

s/ [REDACTED]  
[REDACTED]

**CERTIFICATE OF SERVICE**

I certify that on August 19, 2016, I electronically served this *Declaration of* [REDACTED] via ECF on the following:

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*/s/ Nicole Simmons*  
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