

**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 MEREDITH SCHULTZ IN SUPPORT OF
PLAINTIFF'S MOTION TO COMPEL ALL WORK PRODUCT AND ATTORNEY
CLIENT COMMUNICATIONS WITH PHILIP BARDEN**

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

1. I am a Counsel 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 Motion to Compel Communication All Work Product and Attorney Client Communications with Philip Barden.

3. Attached hereto as Sealed Composite Exhibit 1 is a true and correct copy of Defendant's February 9, 2016; May 16, 2016; and August 1, 2016 Privilege Log.

4. Attached hereto as Sealed Exhibit 2 is a true and correct copy of January 6, 2017, Declaration of Philip Barden.

5. Attached hereto as Sealed Exhibit 3 is a true and correct copy of Excerpts from April 22, 2016, Deposition of Ghislaine Maxwell.

6. Attached hereto as Sealed Exhibit 4 is a true and correct copy of January 2, 2015, E-mail Correspondence (RG(UK)_00009).

7. Attached hereto as Sealed Exhibit 5 is a true and correct copy of Excerpts from
November 18, 2016, Deposition of Ross Gow.

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

/s/ Meredith Schultz
Meredith Schultz, Esq.

Dated: February 22, 2017.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Meredith Schultz

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 22nd day of February, 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/ Meredith Schultz
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