

**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 MS. GIUFFRE'S
MOTION FOR A PROTECTIVE ORDER REGARDING THE SUBPOENA TO APPLE,
INC. SEEKING PRODUCTION OF ALL OF MS. GIUFFRE'S SENT AND RECEIVED
EMAILS AND RELATED DATA**

I, Meredith L. 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 March 28, 2016, Order granting my Application to Appear Pro Hac Vice.

2. I respectfully submit this Declaration in support of Plaintiff Virginia Giuffre's Motion for a Protective Order Regarding the Subpoena to Apple, Inc. Seeking Production of All of Ms. Giuffre's Sent and Received Emails and Related Data.

3. Attached hereto as Exhibit 1 is a true and correct copy of the June 10, 2016, letter to Ms. Menninger.

4. Attached hereto as Exhibit 2 is a true and correct copy of the Notice of Service of Rule 45 Subpoena upon Apple, Inc.

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

Dated: June 13, 2016

/s/ Meredith L. Schultz
Meredith Schultz, Esq. (Pro Hac Vice)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 13th 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.

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/s/ Sigrid S. McCawley

Sigrid S. McCawley