

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

VIRGINIA GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

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No.15-cv-07433-RWS

**DECLARATION OF GREGORY L. POE IN
SUPPORT OF MOTION TO QUASH (OR IN THE
ALTERNATIVE MODIFY) SUBPOENA AND FOR A PROTECTIVE ORDER**

I, Gregory L. Poe, hereby declare as follows:

1. I am the sole member of the Law Offices of Gregory L. Poe PLLC in Washington, D.C. I represent non-party Jeffrey Epstein with respect to a Fed. R. Civ. P. 45 subpoena in the above-referenced matter.

2. I am admitted to practice in the District of Columbia. My D.C. Bar number is 426020. I am a member in good standing of the D.C. Bar. My application to appear *pro hac vice* in the above-referenced matter is pending.

3. I respectfully submit this declaration pursuant to 28 U.S.C. § 1746 in support of Mr. Epstein's motion to quash (or in the alternative modify) the subpoena and for a protective order.

4. Attached hereto as Exhibit 1 is a true and correct copy of a subpoena that Martin Weinberg, who represents Mr. Epstein as a limited intervenor in *Does v. United States*, No. 08-CV-80736-KAM (S.D. Fla.), has informed me he received from counsel for plaintiff in the above-referenced matter.

5. Attached hereto as Exhibit 2 are true and correct copies of email communications from March 7, 2016 to April 7, 2016 that Mr. Weinberg informed me he had with counsel for plaintiff.

6. Attached hereto as Exhibit 3 is a true and correct copy of an email that Mr. Weinberg informed me he sent to counsel for plaintiff on April 11, 2016.

7. Attached hereto as Exhibit 4 are true and correct copies of email communications that Mr. Weinberg informed me he sent to counsel for plaintiff on April 11, 2016, and May 25, 2016.

8. Attached hereto as Exhibit 5 are true and correct copies of email communications that Mr. Weinberg informed me he had with counsel for plaintiff on May 26, 2016.

9. Attached hereto as Exhibit 6 are true and correct copies of email communications that Mr. Weinberg informed me he had with counsel for plaintiff on May 26, 2016.

10. Attached hereto as Exhibit 7 is a true and correct copy of a letter that I sent to counsel for plaintiff on June 9, 2016.

I declare under penalty of perjury on this 16th day of June 2016 that the foregoing is true and correct.

/s/ Gregory L. Poe
Gregory L. Poe
Counsel for Non-Party Jeffrey Epstein

CERTIFICATE OF SERVICE

I hereby certify that, on this 16th day of June, 2016, I caused a true and correct copy of the foregoing Declaration of Gregory L. Poe in Support of Jeffrey Epstein's Motion to Quash (or in the Alternative Modify) Subpoena and for a Protective Order to be served via the Court's CM/ECF system on the following:

Sigrid S. McCawley
Meridith Schultz
BOIES, SCHILLER & FLEXNER, LLP
401 East Las Olas Boulevard, Ste. 1200
Ft. Lauderdale, FL 33301
smccawley@bsflp.com
mschultz@bsflp.com

Paul G. Cassell
383 S. University Street
Salt Lake City, UT 84112
cassellp@law.utah.edu

Bradley J. Edwards
FARMER, JAFFE, WEISSING, EDWARDS,
FISTOS & LEHRMAN, P.L.
425 North Andrews Ave., Ste. 2
Ft. Lauderdale, FL 33301
brad@pathtojustice.com

Laura A. Menninger
Jeffrey S. Pagliuca
HADDON, MORGAN AND FOREMAN, P.C.
150 East 10th Avenue Denver, CO 80203
Phone: 303.831.7364
Fax: 303.832.2628
lmenninger@hmflaw.com

/s/ Rachel S. Li Wai Suen
Rachel S. Li Wai Suen