

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VIRGINIA L. GIUFFRE,

Plaintiff,

vs.

GHISLAINE MAXWELL,

Defendant.

Case No. 15-cv-07433-LAP

**AMENDED DECLARATION OF
SIGRID S. MCCAWLEY**

I, Sigrid S. McCawley, hereby declare as follows:

1. I represent the Plaintiff, Virginia L. Giuffre, in the above-captioned matter.
2. On August 26, 2020, the Court ordered the Original Parties to serve Non-Party Notices on all remaining Non-Parties, ECF No. 1107, and the Original Parties agreed to split responsibility for mailing the Non-Party Notices.
3. On September 11, 2020, the Original Parties each filed declarations stating which Non-Parties they had successfully served with Non-Party Notices. (ECF Nos. 1115, 1116).
4. Upon recent review of Plaintiff's declaration (ECF No. 1115), we determined that in compiling the declaration, Plaintiff's counsel used the incorrect Non-Party pseudonyms to identify certain Non-Parties because counsel was relying on a prior, outdated version of the Non-Party list.
5. I therefore submit this amended declaration to replace Plaintiff's initial declaration (ECF No. 1115) and to identify the correct Non-Party pseudonyms of the Non-Parties to whom Plaintiff sent the Non-Party Notices. Plaintiff has confirmed that this error has not had any other impact on the unsealing process thus far.
6. Pursuant to this Court's August 26, 2020, Defendant's counsel agreed to serve the

Non-Party Notices to J. Doe 1 through J. Doe 92, while Plaintiff's counsel agreed to serve the Non-Party Notices to J. Doe 93 through J. Doe 187.

7. Pursuant to the updated Order and Protocol for Unsealing Decided Motions, ECF No. 1108, I used best efforts to identify the most current addresses for J. Doe 93 through J. Doe 187.

8. I mailed the following documents to the Non-Parties listed in the paragraphs below: (1) Notice to Non-Parties of Possible Unsealing of Sealed Documents, ECF No. 1044; (2) Non-Party's Request for Excerpts of Sealed Documents and Acknowledgement of Court Order and Protocol Governing the Excerpts, *id.*; (3) Non-Party's Objection to Unsealing, *id.*; and (4) the Order and Protocol for Unsealing Decided Motions (Updated August 27, 2020). ECF No. 1108.

9. On September 10, 2020, I sent the Non-Party Notices via first-class certified mail (return receipt requested) and, for international addresses, via FedEx, to the following Non-Parties:

- J. Doe 93
- J. Doe 74
- J. Doe 94
- J. Doe 95
- J. Doe 96
- J. Doe 99
- J. Doe 102
- J. Doe 103
- J. Doe 105
- J. Doe 106
- J. Doe 107
- J. Doe 108
- J. Doe 109
- J. Doe 110
- J. Doe 113
- J. Doe 115
- J. Doe 118
- J. Doe 119
- J. Doe 120
- J. Doe 121
- J. Doe 122
- J. Doe 123
- J. Doe 125
- J. Doe 126
- J. Doe 127
- J. Doe 128
- J. Doe 129
- J. Doe 130
- J. Doe 131
- J. Doe 133
- J. Doe 134
- J. Doe 136
- J. Doe 138
- J. Doe 139
- J. Doe 140
- J. Doe 141
- J. Doe 142
- J. Doe 143
- J. Doe 144
- J. Doe 145
- J. Doe 147
- J. Doe 148
- J. Doe 150
- J. Doe 151
- J. Doe 153
- J. Doe 154
- J. Doe 155
- J. Doe 158
- J. Doe 162
- J. Doe 165
- J. Doe 166
- J. Doe 169
- J. Doe 171
- J. Doe 174
- J. Doe 175
- J. Doe 178
- J. Doe 181
- J. Doe 182
- J. Doe 183
- J. Doe 185
- J. Doe 186
- J. Doe 187

10. On September 11, I sent the Non-Party Notices via first-class certified mail (return receipt requested) and, for international addresses, via FedEx, to the following Non-Parties:

- J. Doe 97
- J. Doe 101
- J. Doe 116
- J. Doe 164
- J. Doe 170
- J. Doe 176
- J. Doe 179

11. I have not sent Non-Party Notices to the following Non-Parties because, using best

efforts, I have been unable to locate an address for them:

- J. Doe 98
- J. Doe 100
- J. Doe 111
- J. Doe 112
- J. Doe 114
- J. Doe 117
- J. Doe 124
- J. Doe 135
- J. Doe 137
- J. Doe 146
- J. Doe 149
- J. Doe 152
- J. Doe 159
- J. Doe 160
- J. Doe 161
- J. Doe 163
- J. Doe 167
- J. Doe 168
- J. Doe 172
- J. Doe 173
- J. Doe 177
- J. Doe 180

12. I have not sent the Non-Party Notice to the following deceased Non-Parties:

- J. Doe 104
- J. Doe 132
- J. Doe 156
- J. Doe 184

I hereby declare under penalty of perjury that the foregoing statements are true and correct.

Dated: February 7, 2023

Respectfully Submitted,

BOIES SCHILLER FLEXNER LLP

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