

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

ALLYSON WARD, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

DARREN K. INDYKE and RICHARD D.
KAHN,

Defendants.

Case No. 1:24-cv-01204-AS

**DECLARATION OF SIGRID S. MCCAWLEY IN SUPPORT OF LEAD PLAINTIFF
ALLYSON WARD’S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION
SETTLEMENT**

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

1. I am a member in good standing of the bar of the State of New York and am admitted to practice before this Court. I am a Managing Partner of the law firm Boies Schiller Flexner LLP (“BSF”). I make this declaration on my own personal knowledge, and if called as a witness to testify, I could and would testify competently to the following facts.

2. I submit this declaration in support of the motion filed by Allyson Ward (“Plaintiff” or “Lead Plaintiff”), for preliminary approval of class action settlement with Defendants Darren K. Indyke and Richard D. Kahn (“Defendants” and together with Plaintiff, the “Parties”). My firm represents the Lead Plaintiff in the above-captioned action (the “Litigation”).

3. BSF has invested significant resources into investigating and litigating this case, and as such, has moved to be appointed Class Counsel.

A. Relevant Firm Experience

4. BSF has a strong record of successfully and diligently representing plaintiffs in complex class action litigation. Recent cases in which BSF or its partners were lead or co-lead counsel include: *In re Grupo Televisa Securities Litigation* (1:18-cv-01979) (S.D.N.Y.), in which the court granted final approval of a settlement in August of 2023; *In re Blue Cross Blue Shield Antitrust Litigation* (2:13-cv-20000) (N.D. Ala.), an antitrust class action in which BSF achieved both what the court referred to as “historic” injunctive relief and a \$2.7 billion award in a settlement that received final approval in October 2022; *In re Takata Airbag Products Liability Litigation* (1:15-md-02599) (S.D. Fla.), in which the Firm obtained a recovery of more than \$1.5 billion in a products liability class action, which is still proceeding against certain defendants but in which there has already been a recovery of more than \$1.5 billion; and *In re Halliburton Securities Litigation* (13-317), in which BSF won two appeals to the U. S. Supreme Court before achieving a \$100 million recovery.

5. BSF was also appointed as co-class counsel for *Doe 1 v. JPMorgan Chase Bank, N.A.*, (22-cv-10019) (S.D.N.Y.). There, the Court granted class certification for similar claims against JPMorgan Chase, with BSF as co-class counsel. BSF led the case through discovery and eventually to an agreeable settlement for all involved victims. The Court also granted class certification for similar claims against Deutsche Bank for settlement purposes.

6. Another notable case in which BSF was lead counsel is *In re Auction House Antitrust Litigation* (1:00-cv-00648) (S.D.N.Y.), in which the firm won \$512 million in an antitrust class action after prior interim lead counsel valued the case at less than \$100 million.

7. BSF has expended substantial time and resources in actively and diligently litigating this action. The BSF litigation team has over ten thousand hours and substantial resources

in developing the Lead Plaintiff's case, undertaking substantial discovery, and engaging in motion practice. In preparation for the filing of this action, BSF engaged in extensive research, conducted dozens of interviews, and reviewed thousands of documents. BSF confidentially interviewed over 50 individuals, including dozens of survivors. Additionally, BSF conducted significant research into Defendants and reviewed an enormous volume of publicly available documents regarding Jeffrey Epstein and his sex-trafficking operation. BSF expended considerable resources once the suit was filed engaging in extensive discovery efforts, including extensive fact, class certification, and expert discovery, 15 depositions, producing and reviewing hundreds of thousands of pages of documents, and preparing and rebutting reports for four expert witnesses. BSF also engaged in motion practice and opposed Defendants' motions, including discovery disputes, a motion to dismiss, a motion for class certification, and a motion for summary judgment.

8. The expenses that BSF has incurred include the retention of expert witnesses, consultants, and an e-discovery vendor.

9. On October 28, 2025, the Parties participated in a confidential mediation with Defendants before Simone Lelchuk, Melnick ADR, an experienced mediator. The mediation was preceded by the submission and exchange of mediation statements by the Parties. The Settling Parties engaged in good faith negotiations during the mediation and over the following months and reached settlement in principle on December 19, 2025. The settlement in principle included, among other things, the Settling Parties' agreement to settle and dismiss with prejudice the Litigation and grant full mutual releases in return for a cash payment of \$35 million U.S. Dollars, if there are 40 or more Eligible Class Members, or \$25 million U.S. Dollars, if there are less than 40 Eligible Class Members by and/or behalf of the Epstein Estate for the benefit of the Class, subject to the negotiation of the terms of a Stipulation of Settlement and approval by the Court.

B. Team Members

10. The BSF litigation team include myself, David Boies, Andrew Villacastin, and 28 other lawyers, as well as a full support staff led by experienced paralegals.

11. **Sigrid McCawley:** Sigrid McCawley is a Managing Partner of BSF. Ms. McCawley’s experience and talents have been nationally recognized, having been named Litigator of the Year by *The American Lawyer*, a 2024 Titan of the Plaintiffs Bar, Top Ten Female Litigator in 2020–2023 by *Benchmark Litigation*, a finalist for Lawyer of the Year by *The American Lawyer* in 2022, a finalist for Attorney of the Year in Florida by *Daily Business Review*, and numerous other awards. Ms. McCawley has handled some of BSF’s most challenging disputes, including securing a \$100 million victory in the landmark case before the U.S. Supreme Court in *In re Halliburton Securities Litigation* (No. 13-317).

12. Ms. McCawley’s experience representing survivors of sexual abuse is also well-documented. Ms. McCawley has devoted years of her career to advocating on behalf of survivors of Jeffrey Epstein, including in cases against Prince Andrew, Ghislaine Maxwell, and the Epstein Estate. Ms. McCawley was recognized by Forbes Magazine for her “iron clad interrogation skills” during the deposition of Ghislaine Maxwell. Her work contributed to the arrest of Jeffrey Epstein, Ghislaine Maxwell, and Jean-Luc Brunel, and resulted in a successful resolution of claims for numerous Epstein survivors. Ms. McCawley’s work for survivors of Jeffrey Epstein has been featured on Netflix, Lifetime, 60 Minutes, ABC, NBC, CBS, CNN, and Fox, and has been reported on in *The New York Times* and *The Wall Street Journal*.

13. I, along with Mr. Boies, have represented survivors of Jeffrey Epstein’s sex trafficking enterprise since June 2014. We brought their first case on behalf of survivors against Ghislaine Maxwell in 2015 and their first case against Jeffrey Epstein on behalf of survivors in

2016. Most recently, we served as co-class counsel representing victims of Jeffrey Epstein in a class action against JP Morgan Chase Bank and Deutsche Bank in *Jane Doe v. JPMorgan Chase Bank, N.A.* (1:22-cv-10018) (S.D.N.Y.) and *Jane Doe v. Deutsche Bank* (1:22-cv-10019) (S.D.N.Y.).

14. We have also represented survivors in civil litigation against Epstein's Estate after his death, *see Farmer v. Indyke, et al.* (1:19-cv-10474) (S.D.N.Y.); *Farmer v. Indyke, et al.* (1:19-cv-10475) (S.D.N.Y.); *Helm v. Indyke, et al.* (1:19-cv-10476) (S.D.N.Y.); *Bryant v. Indyke, et al.* (1:19-cv-10479) (S.D.N.Y.); *Doe 1000 v. Indyke, et al.* (1:19-cv-10577) (S.D.N.Y.), and have represented survivors who made applications to the Epstein Victim's Compensation Fund. We also represented an Epstein survivor in her civil lawsuit against Prince Andrew, *Giuffre v. Andrew* (21-cv-6702) (S.D.N.Y.).

15. **David Boies:** David Boies personally served as co-lead counsel in cases such as *In re Grupo Televisa Securities Litigation* (1:18-cv-01979) (S.D.N.Y.), *In re Halliburton Securities Litigation* (13-317), *In re Blue Cross Blue Shield Antitrust Litigation* (2:13-cv-20000) (N.D. Ala.), *In re Takata Airbag Products Liability Litigation* (1:15-md-02599) (S.D. Fla.), *In re Vitamins Antitrust Litigation* (99-7256, 99-7281) (D.D.C.).

16. **Andrew Villacastin:** Andrew Villacastin is a partner at BSF. In 2022, Mr. Villacastin was recognized in the 2023-2025 editions of *Best Lawyers in America* as Ones to Watch for his work in commercial litigation. Mr. Villacastin also has significant experience litigating class actions—he is currently defending a life insurance company in multiple class action lawsuits and has represented a major bank in multidistrict LIBOR-related actions involving antitrust, securities, RICO, Commodities Exchange Act, and state law claims. As mentioned above, Mr.

Villacastin has been a zealous advocate for survivors of Jeffrey Epstein for six years and has worked on many of the aforementioned Epstein-related cases alongside Ms. McCawley.

17. As set forth in the accompanying Memorandum of Law, my colleagues and I have diligently worked to identify a class of over forty women through documents produced by Defendants and publicly available information.

C. Exhibits in Support of Allyson Ward’s Motion for Preliminary Approval of Class Action Settlement

18. Attached are true and accurate copies of the following documents:

- a. Exhibit A: The Settlement Agreement, dated February 19, 2026.
- b. Exhibit B: Declaration of Mediator Simone Lelchuk, dated February 18, 2026.

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

Dated: February 19, 2026

Respectfully Submitted,

/s/ Sigrid S. McCawley

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