

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

JANE DOE,

Plaintiff,

-against-

CORNELL UNIVERSITY, INC., et al.

Defendants.

Index No. 161704/2026

Motion Seq. 003

**AFFIDAVIT OF THOMAS
P. GIUFFRA, ESQUIRE, IN
SUPPORT OF ADMISSION
PRO HACE VICE**

I, Thomas P. Giuffra, Esq., being duly sworn, affirms the contents of the following to be true under penalties of perjury:

1. I am providing this affidavit in support of the admission of my cooperative counsel, W. Whitney Seals, Esq., *pro hac vice* in the above-captioned matter.

2. I am a duly licensed attorney and partner at the law firm of Rheingold Giuffra Ruffo Plotkin & Hellman, LLP, retained as attorneys for Plaintiff JANE DOE in this action, and a member of the bar of this Court. I have been licensed to practice law in the State of New York since 1995, and my bar registration number is 2646065.

3. W. Whitney Seals is a partner at the law firm of Cochrun & Seals, LLC, and has been a member of the Bar of the State of Alabama since 2004.

4. After reasonable investigation and after practicing law alongside attorney Seals, I believe him to be a reputable and competent attorney and I am in the proper position to recommend him for admission *pro hac vice* in the Supreme Court of the State of New York.

I affirm this 19th day of October 2026, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

Dated: New York, NY
October 19, 2026



THOMAS P. GIUFFRA, ESQ.

Attorney for Plaintiff

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