

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
VIRGINIA L. GIUFFRE,
Plaintiff,
v.
GHISLAINE MAXWELL,
Defendant.
-----X

15-cv-07433-RWS

**Declaration of Laura A. Menninger in Support of
Defendant's Response to "Motion to Compel" Work Product
and Attorney-Client Communication with Philip Barden**

I, Laura A. Menninger, declare as follows:

1. I am an attorney at law duly licensed in the State of New York and admitted to practice in the United States District Court for the Southern District of New York. I am a member of the law firm Haddon, Morgan & Foreman, P.C., counsel of record for Defendant Ghislaine Maxwell in this action. I respectfully submit this Declaration in support of Ms. Maxwell's Response to "Motion to Compel" Work Product and Attorney-Client Communications with Philip Barden.

2. Attached as Exhibit A (filed under seal) are true and correct copies of excerpts from Ms. Maxwell's Initial F. R.C.P. 26(a)(1)(A) Disclosures, dated February 24, 2016.

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

Executed on March 2, 2017.

s/ Laura A. Menninger

Laura A. Menninger

CERTIFICATE OF SERVICE

I certify that on March 2, 2017, I electronically served this *Declaration of Laura A. Menninger in Support of Defendant's Response to "Motion to Compel" Work Product and Attorney-Client Communications with Philip Barden* via ECF on the following:

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/s/ Nicole Simmons

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