

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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

15-cv-07433-RWS

**Declaration of Laura A. Menninger in Support of Defendant's Response
in Opposition to Plaintiff's Motion to Reopen Defendant's Deposition**

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 Plaintiff's Motion to Reopen Defendant's Deposition.

2. Attached as Exhibit A (filed under seal) are true and correct copies of excerpts from the April 22, 2016 deposition of Ghislaine Maxwell, designated Confidential under the Protective Order.

3. Attached as Exhibit B (filed under seal) are true and correct copies of communication between Mr. Gow and Ms. Maxwell Bates stamped GM_01036-01044.

4. Attached as Exhibit C (filed under seal) are true and correct copies of media email inquiries requesting Ms. Maxwell's input Bates stamped GM_01060-01068,00594.

5. Attached as Exhibit D (filed under seal) are true and correct copies of communications between Ms. Maxwell, Mr. Epstein and Mr. Barden Bates stamped GM_01069-01072;01084-01099.

6. Attached as Exhibit E (filed under seal) are true and correct copies of Plaintiff's medical releases requesting healthcare information sent October 10, 2016 Bates stamped GIUFFRE009094-009102.

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

Executed on October 24, 2016.

s/ Laura A. Menninger

Laura A. Menninger

CERTIFICATE OF SERVICE

I certify that on October 24, 2016, I electronically served this *Declaration of Laura A. Menninger in Support of Defendant's Response in Opposition to Plaintiff's Motion to Compel Data from Defendant's (Non-Existent) Undisclosed Email Account and For an Adverse Inference Instruction* via ECF on the following:

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/s/ Nicole Simmons

Nicole Simmons