

**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 Sur Sur Reply In Support of Motion for Rule 37(b) & (c) Sanctions**

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 ("Maxwell") in this action. I respectfully submit this declaration in support of Reply to Plaintiff's Opposition to Defendant's Motion To Reopen Plaintiff's Deposition.

2. Attached as Exhibit U (filed under seal) are true and correct copies of excerpts from the deposition of Dr. Steven Olson, designated as Confidential under the Protective Order.

3. Attached as Exhibit V (filed under seal) are true and correct copies of Exhibit 6 from the deposition of Dr. Steven Olson, designated as Confidential under the Protective Order.

4. Attached as Exhibit W (filed under seal) are true and correct copies of Exhibit 7 from the deposition of Dr. Steven Olson, designated as Confidential under the Protective Order.

5. Attached as Exhibit X (filed under seal) is a true and correct copy of a letter from Laura A. Menninger to Meredith Schultz dated July 14, 2016.

Dated: July 25, 2016

By: /s/ Laura A. Menninger

Laura A. Menninger

### **CERTIFICATE OF SERVICE**

I certify that on July 25, 2016, I electronically served this *Declaration Of Laura A. Menninger In Support Of Defendant's Sur Sur Reply In Support of Motion for Rule 37(b) & (c) Sanctions* via ECF on the following:

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/s/ Nicole Simmons

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