

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

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VIRGINIA L. GIUFFRE,	:	
Plaintiff,	:	
v.	:	15-cv-07433-RWS
GHISLAINE MAXWELL,	:	
Defendant.	:	
-----X	:	

**Declaration Of Laura A. Menninger In Support Of
Defendant's Motion For Leave to File A Sur-Reply Or, Alternatively,
to Strike Plaintiff's Misrepresentations of Fact to the Court**

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 Motion for Leave to File A Sur-Reply Or, Alternatively, to Strike Plaintiff's Misrepresentations of Fact to the Court.

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

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

4. Attached as Exhibit C (filed under seal) are true and correct copies of excerpts from the deposition of Detective Joseph Recarey designated as Confidential under the Protective Order.

5. Attached as Exhibit D (filed under seal) are true and correct copies of excerpts from the deposition of [REDACTED], designated as Confidential under the Protective Order.

6. Attached as Exhibit E (filed under seal) are true and correct copies of excerpts from the deposition of Juan Alessi, designated as Confidential under the Protective Order.

7. Attached as Exhibit F (filed under seal) are true and correct copies of excerpts from the deposition of [REDACTED], designated as Confidential under the Protective Order.

Executed on August 25, 2016

By: /s/ Laura A. Menninger
Laura A. Menninger

CERTIFICATE OF SERVICE

I certify that on August 25, 2016, I electronically served this *Declaration Of Laura A. Menninger In Support Of Defendant's Motion for Leave to File A Sur-Reply Or, Alternatively, to Strike Plaintiff's Misrepresentations of Fact to the Court* via ECF on the following:

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