

**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 Response In Opposition
To Motion For Protective Order And Motion For the Court to Direct Defendant to Disclose
All Individuals to Whom Defendant Has Disseminated Confidential Information**

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 Defendant's Reponse in Opposition to Motion for Protective Order and Motion for the Court to Direct Defendant to Disclose All Individuals Whom Defendant has Disseminated Confidential Information.

2. Attached as Exhibit A is a true and correct copy of records from **Royal Palm Beach Police Department dated November 4, 1997**, designated as Confidential by Plaintiff in this case. Such Confidential designation has been challenged by the defense.

3. Attached as Exhibit B is a true and correct copy of records from **Royal Palm Beach Police Department dated January 29, 1998**, designated as Confidential by Plaintiff in this case. Such Confidential designation has been challenged by the defense.

4. Attached as Exhibit C is a true and correct copy of records from **Palm Beach County Sheriff's Office** dated February 28, 1998, designated as Confidential by Plaintiff in this case. Such Confidential designation has been challenged by the defense.

5. Attached as Exhibit D is a true and correct copy of records from **Royal Palm Beach County Police Department** dated June 10, 2001, designated as Confidential by Plaintiff in this case. Such Confidential designation has been challenged by the defense.

6. Attached as Exhibit E is a true and correct copy of records from **Royal Palm Beach Police Department** dated August 3, 2001, designated as Confidential by Plaintiff in this case. Such Confidential designation has been challenged by the defense.

7. Attached as Exhibit F is a true and correct copy of records from **Greenacres Department of Public Safety and Palm Beach County Criminal Court** concerning events on **March 4, 2002**, designated as Confidential by Plaintiff in this case. Such Confidential designation has been challenged by the defense.

8. Attached as Exhibit G is a true and correct copy of records from **Fremont County (Colorado) Sheriff's Office** dated January 18 through January 22, 2015, and March 4, 2015, designated as Confidential by Plaintiff in this case. Such Confidential designation has been challenged by the defense.

Dated: August 18, 2016

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

CERTIFICATE OF SERVICE

I certify that on August 18, 2016, I electronically served this *Declaration Of Laura A. Menninger In Support Of Defendant's Defendant's Reponse in Opposition to Motion for Protective Order and Motion for the Court to Direct Defendant to Disclose All Individuals Whom Defendant has Disseminated Confidential Information.* via ECF on the following:

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/s/ Nicole Simmons