

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 Compel Data from Defendant's (Non-Existent)  
Undisclosed Email Account and For an Adverse Inference Instruction**

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 Compel Data from Defendant's (Non-Existent) Undisclosed Email Account and For an Adverse Inference Instruction.
2. Attached as Exhibit A (filed under seal) is a true and correct copy of correspondence from Meredith Schultz to Jeffrey Pagliuca and Laura Menninger on May17, 2016.
3. Attached as Exhibit B (filed under seal) are true and correct copy of correspondence from Laura Menninger to Sigrid McCawley dated June 13, 2016.

4. Attached as Exhibit C (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.

5. Attached as Exhibit D (filed under seal) correct copies of excerpts from the January 16, 2016 deposition of Virginia Guiffre in the, *Edwards et al. v. Dershowitz* matter, designated Confidential under the Protective Order.

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

Executed on October 24, 2016.

*s/ Laura A. Menninger*

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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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