

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.

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**Declaration of Laura A. Menninger in Support of  
Defendant's Response to Motion to Compel**

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.

2. As counsel for Ms. Maxwell, I and other attorneys of my law firm have an attorney-client relationship with Ms. Maxwell and have created attorney work product as part of our representation of her.

3. Since no later than April 2015, Ms. Maxwell has had a joint defense agreement with Jeffrey Epstein. The joint defense agreement was entered into in anticipation of litigation.

4. Ms. Maxwell shares a common interest with both Jeffrey Epstein and Alan Dershowitz. In her story about “sexual trafficking,” Plaintiff has accused all three of playing some role in victimizing her as part of the same “sexual trafficking” scheme. Since before 2015 Plaintiff deliberately and widely publicized her allegations against all three. Moreover, Plaintiff and her attorneys have been involved in litigation against all three. Depending on the factual or legal issue, Mr. Epstein, Professor Dershowitz and Ms. Maxwell, or Ms. Maxwell and Mr. Epstein, or Ms. Maxwell and Professor Dershowitz, or their respective attorneys—have exchanged information subject to protection under the attorney-client privilege, the attorney work product doctrine, or both. At least one of the principal purposes of exchanging this information was to pursue and consider pursuing an ongoing common enterprise as to which all the information-exchanging participants have a common intent to further that enterprise.

5. I and Professor Dershowitz’s attorney Mary Borja have exchanged in emails and telephone calls information containing our mental impressions, conclusions, opinions and theories concerning issues relating to ongoing legal matters, including this action.

6. I and Mr. Epstein’s attorney [REDACTED] have exchanged in emails and telephone calls information containing our mental impressions, conclusions, opinions and theories concerning issues relating to ongoing legal matters, including this action.

7. Attached as Exhibit A (filed under seal) is a true and correct copy of Ms. Maxwell’s privilege log.

8. Attached as Exhibit B is a true and correct copy of Ms. Maxwell’s Response to Plaintiff’s Second Set of Requests for Production of Documents.

9. Attached as Exhibit C is a true and correct copy of the article, “Alleged ‘sex slave’ of Jeffrey Epstein, Prince Andrew accused 2 men of rape in 1998, but was found not credible”, *New York Daily News*, Feb. 23, 2015.

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

Executed on August 19, 2016.

s/ Laura A. Menninger

Laura A. Menninger

### **CERTIFICATE OF SERVICE**

I certify that on August 19, 2016, I electronically served this *Declaration of Laura A. Menninger in Support of Defendant’s Response to Motion To Compel Production Of Documents* via ECF on the following:

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/s/ Nicole Simmons

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