

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 Motion *In Limine* To Exclude *In Toto* Certain
Depositions Designated By Plaintiff For Use At Trial**

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 in Limine to Exclude In Toto Certain Depositions Designated by Plaintiff for Use at Trial.
2. Attached as Exhibit A (filed under seal) are true and correct copies of excerpts from the deposition of Ronald Rizzo on June 10, 2016, designated Confidential under the Protective Order.

3. Attached as Exhibit B (filed under seal) are true and correct copies of excerpts from the deposition of Detective Joseph Recarey on June 21, 2016, designated Confidential under the Protective Order.

4. Attached as Exhibit C (filed under seal) are true and correct copies of excerpts from the deposition of Jeffrey Epstein on September 9, 2016, designated 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] on June 20, 2016, designated Confidential under the Protective Order.

6. Attached as Exhibit E (filed under seal) are true and correct copies of excerpts from the continuous days of deposition of Alfredo Rodriguez on July 29 and August 7, 2009 designated Confidential under the Protective Order multiple and various cases.

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

Executed on January 27, 2017.

s/ Laura A. Menninger
Laura A. Menninger

CERTIFICATE OF SERVICE

I certify that on January 27, 2017, I electronically served this *Declaration of Laura A. Menninger in Support of Defendant's Motion in Limine to Exclude In Toto Certain Depositions Designated by Plaintiff for Use at Trial* via ECF on the following:

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/s/ Nicole Simmons

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