

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
VIRGINIA L. GIUFFRE,  
Plaintiff,  
v.  
GHISLAINE MAXWELL,  
Defendant.  
-----X

15-cv-07433-RWS

**DECLARATION OF LAURA A. MENNINGER IN SUPPORT OF DEFENDANT'S  
REPLY IN SUPPORT OF MOTION TO COMPEL NON-PRIVILEGED DOCUMENTS**

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 Reply in Support of Motion to Compel Non-Privileged Documents.

2. Attached as Exhibit K (filed under seal) [REDACTED]

[REDACTED]

[REDACTED]

3. Attached as Exhibit L (filed under seal) [REDACTED]

[REDACTED]

[REDACTED]

4. Attached as Exhibit M (filed under seal) [REDACTED]

[REDACTED]

[REDACTED]

By: /s/ Laura A. Menninger

Laura A. Menninger

### **CERTIFICATE OF SERVICE**

I certify that on June 6, 2016, I electronically served this *Declaration of Laura A. Menninger In Support Of Defendant's Reply In Support Of Motion To Compel Non-Privileged Documents* via ECF on the following:

Sigrid S. McCawley  
Meridith Schultz  
BOIES, SCHILLER & FLEXNER, LLP  
401 East Las Olas Boulevard, Ste. 1200  
Ft. Lauderdale, FL 33301  
smccawley@bsfllp.com  
mschultz@bsfllp.com

Paul G. Cassell  
383 S. University Street  
Salt Lake City, UT 84112  
cassellp@law.utah.edu

Bradley J. Edwards  
FARMER, JAFFE, WEISSING, EDWARDS,  
FISTOS & LEHRMAN, P.L.  
425 North Andrews Ave., Ste. 2  
Ft. Lauderdale, FL 33301  
brad@pathtojustice.com

/s/ Nicole Simmons

Nicole Simmons