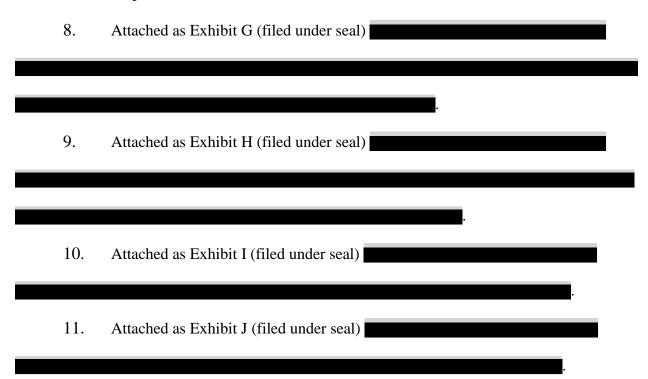
UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

	X	
VIRGINIA L. GIUFFRE,		
Plaintiff, v.		15-cv-07433-RWS
GHISLAINE MAXWELL,		
Defendant.		
	X	

Declaration Of Laura A. Menninger In Support Of Defendant's Motion For Rule 37(B) &(C) Sanctions For Failure To Comply With Court Order And Failure To Comply With Rule 26(A)

- 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 Motion for Rule 37(b) &(c) Sanctions for Failure to Comply with Court Order and Failure to Comply with Rule 26(a).
- 2. Attached as Exhibit A is a true and correct copy of excerpts from Plaintiff's Response and Objections to Defendant's First Set of Discovery Requests to Plaintiff, served March 16, 2016.

- 3. Attached as Exhibit B is a true and correct copy of excerpts from Plaintiff's Amended and Supplemental Response and Objections to Defendant's First Set of Discovery Requests to Plaintiff, served March 22, 2016.
- 4. Attached as Exhibit C is a true and correct copy of Addendum to Plaintiff's Rule 26 Initial Disclosures, served March 22, 2016.
- 5. Attached as Exhibit D is a true and correct copy of Plaintiff, Virginia Giuffre's Revised Disclosure Pursuant to Fed. R. Civ. P. 26, served March 11, 2016.
- 6. Attached as Exhibit E is a true and correct copy of the transcript of the hearing held before this Court on April 21, 2016.
- 7. Attached as Exhibit F is a true and correct copy of Plaintiff's Second Amended Supplemental Response and Objections to Defendant's First Set of Discovery Requests to Plaintiff, served April 29, 2016.



12. Attached as Exhibit K (filed under seal)

- 13. Attached as Exhibit L is a true and correct copy of a letter from Laura A. Menninger to Sigrid McCawley dated April 25, 2016 concerning discovery.
- 14. Attached as Exhibit M is a true and correct copy of a letter from Sigrid McCawley to Laura A. Menninger and documents produced by Plaintiff bates labeled GIUFFRE005370-5430, produced by Plaintiff on May 12, 2016.
- 15. Attached as Exhibit N is a true and correct copy of a letter from Sigrid McCawley to Laura A. Menninger enclosing documents based labeled GIUFFRE005607-5613, produced by Plaintiff on June 14, 2016.

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

CERTIFICATE OF SERVICE

I certify that on June 20, 2016, I electronically served this *Declaration Of Laura A*. *Menninger In Support Of Defendant's Motion For Rule 37(B) &(C) Sanctions For Failure To Comply With Court Order And Failure To Comply With Rule 26(A)* via ECF on the following:

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/s/ Nicole Simmons

Nicole Simmons