

**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 Motion
to Reopen Deposition of Plaintiff Virginia Giuffre**

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 to Reopen Deposition of Plaintiff Virginia Giuffre.
2. Attached as Exhibit A is a true and correct copy of the transcript of the hearing held before this Court on April 21, 2016.
3. Attached as Exhibit B is a true and correct copy of a letter from Laura A. Menninger to Sigrid McCawley dated April 25, 2016 concerning discovery.
4. Attached as Exhibit C 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.

5. Attached as Exhibit D (filed under seal) [REDACTED]

6. Attached as Exhibit E (filed under seal) [REDACTED]

7. Attached as Exhibit F (filed under seal) [REDACTED]

8. Attached as Exhibit G (filed under seal) [REDACTED]

9. Attached as Exhibit H (filed under seal) [REDACTED]

10. Attached as Exhibit I (filed under seal) [REDACTED]

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

12. Attached as Exhibit L is a true and correct copy of a letter from Laura A.

Menninger to Sigrid McCawley and Meredith Shultz dated June 13, 2016 concerning discovery.

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

14. Attached as Exhibit N (filed under seal) [REDACTED]

[REDACTED]

By: /s/ Laura A. Menninger

Laura A. Menninger

CERTIFICATE OF SERVICE

I certify that on June 21, 2016, I electronically served this *Declaration Of Laura A. Menninger In Support Of Defendant's Motion to Reopen Deposition of Plaintiff Virginia Giuffre* via ECF on the following:

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/s/ Nicole Simmons

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