

- UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

5. Attached as Exhibit D (filed under seal) is a true and correct copy of correspondence from me to Meredith Schultz dated July 19, 2016.

6. Attached as Exhibit E (filed under seal) is a true and correct copy of correspondence from Meredith Schultz to me dated July 20, 2016.

7. Attached as Exhibit F (filed under seal) are the search terms utilized by the Defendant in searching her devices.

8. I employed a licensed and certified forensic examiner to image Ms. Maxwell's laptop computer and mobile phone. The forensic examiner also captured all email on the servers for Ms. Maxwell's personal and business email accounts. He ran search terms against those images as directed by me and reflected in Exhibit F.

9. I reviewed approximately 6,000 documents that were captured using the search terms listed in Exhibit F from one or more of Ms. Maxwell's devices and email accounts. Apart from privileged documents related to this case, none of the documents captured were responsive to Plaintiff's discovery requests. The privileged documents were added to Ms. Maxwell's privilege log.

10. My law partner and co-counsel, Jeffrey Pagliuca, reviewed approximately 3,500 documents that were captured using the search terms listed in Exhibit F from one or more of Ms. Maxwell's devices and email accounts. Apart from privileged documents related to this case, none of the documents captured were responsive to Plaintiff's discovery requests.

11. I reviewed all documents contained within the [REDACTED] account. There were no responsive documents contained in that account.

12. I also reviewed two devices (an iPhone and an iPad) that Ms. Maxwell uses for reading periodicals and newspapers but does not use for email communications, text messaging

or other document transmissions or photography. Those devices did not contain any responsive documents.

Dated: August 1, 2016

By: /s/ Laura A. Menninger

Laura A. Menninger

CERTIFICATE OF SERVICE

I certify that on August 1, 2016, I electronically served this Declaration Of Laura A. Menninger In Support Of Defendant's Submission Regarding "Search Terms" And Notice Of Compliance With Court Order Concerning Forensic Examination Of Computer Devices via ECF on the following:

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

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

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

J. Stanley Pottinger
49 Twin Lakes Rd.
South Salem, NY 10590
StanPottinger@aol.com

/s/ Nicole Simmons

Nicole Simmons