

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

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VIRGINIA L. GIUFFRE,	:	
Plaintiff,	:	
v.	:	<b>15-cv-07433-RWS</b>
GHISLAINE MAXWELL,	:	
Defendant.	:	
-----X		

**Declaration Of Laura A. Menninger In Support Of Defendant's Motion to Compel Responses to Defendant's Second Set of Discovery Requests to Plaintiff, and for Sanctions**

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 Compel Responses to Defendant's Second Set of Discovery Requests to Plaintiff, and for Sanctions.

2. Attached as Exhibit A is a true and correct copy of Defendant's Second Set of Discovery Requests to Plaintiff, dated May 31, 2016.

3. Attached as Exhibit B (filed under seal) is a true and correct copy of Plaintiff's Responses and Objections to Defendant's Second Request for Production and Defendant's Interrogatories, Plaintiff's Answers to Defendant's Requests for Admission, dated July 1, 2016.

Dated: August 10, 2016

By: /s/ Laura A. Menninger

Laura A. Menninger

**CERTIFICATE OF SERVICE**

I certify that on August 10, 2016, I electronically served this Declaration Of Laura A. Menninger In Support Of Defendant's Motion to Compel Responses to Defendant's Second Set of Discovery Requests to Plaintiff, and for Sanctions via ECF on the following:

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/s/ Nicole Simmons

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