

**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 Response In Opposition
To Motion For Protective Order And Motion For the Court to Direct Defendant to Disclose
All Individuals to Whom Defendant Has Disseminated Confidential Information**

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 Reponse in Opposition to Motion for Protective Order and Motion for the Court to Direct Defendant to Disclose All Individuals Whom Defendant has Disseminated Confidential Information.

2. Attached as Exhibit A is a true and correct copy of records from [REDACTED], designated as Confidential by Plaintiff in this case. Such Confidential designation has been challenged by the defense.

3. Attached as Exhibit B is a true and correct copy of records from [REDACTED], designated as Confidential by Plaintiff in this case. Such Confidential designation has been challenged by the defense.

4. Attached as Exhibit C is a true and correct copy of records from [REDACTED]
[REDACTED], designated as Confidential by Plaintiff in this case. Such Confidential designation has been challenged by the defense.

5. Attached as Exhibit D is a true and correct copy of records from [REDACTED]
[REDACTED], designated as Confidential by Plaintiff in this case. Such Confidential designation has been challenged by the defense.

6. Attached as Exhibit E is a true and correct copy of records from [REDACTED]
[REDACTED], designated as Confidential by Plaintiff in this case. Such Confidential designation has been challenged by the defense.

7. Attached as Exhibit F is a true and correct copy of records from [REDACTED]
[REDACTED]
[REDACTED], designated as Confidential by Plaintiff in this case. Such Confidential designation has been challenged by the defense.

8. Attached as Exhibit G is a true and correct copy of records from [REDACTED]
[REDACTED], designated as Confidential by Plaintiff in this case. Such Confidential designation has been challenged by the defense.

Dated: August 18, 2016

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

CERTIFICATE OF SERVICE

I certify that on August 18, 2016, I electronically served this *Declaration Of Laura A. Menninger In Support Of Defendant's Defendant's Reponse in Opposition to Motion for Protective Order and Motion for the Court to Direct Defendant to Disclose All Individuals Whom Defendant has Disseminated Confidential Information.* 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@pathtojjustice.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