

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** [REDACTED]

I, [REDACTED], declare as follows:

1. I am an attorney at law duly licensed in the District of Columbia.  
2. I am familiar generally with the subject matter of this action, No. 15-cv-07433-RWS (S.D.N.Y.).

3. From 2015 to the present time I have been representing [REDACTED]  
[REDACTED]. Although Ms. Giuffre is not a  
[REDACTED], central to that action are her allegations that she was the  
victim of “sexual trafficking.”

4. Based on my knowledge of the [REDACTED] action and this action, I [REDACTED]  
[REDACTED] and Defendant Ghislaine Maxwell have a [REDACTED], namely, of defending  
against allegations by and on behalf of Ms. Giuffre regarding alleged abuse.

5. During the course of my representation [REDACTED], I have on various  
occasions exchanged information via email with Ms. Maxwell’s counsel Laura Menninger.  
These emails are attorney work product because the information we exchanged implicates my or

Ms. Menninger's or both of our mental impressions, conclusions, opinions and/or theories concerning the defense of Ms. Giuffre's allegations and related factual and legal matters.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 19, 2016.

s/ [REDACTED]  
[REDACTED]

### CERTIFICATE OF SERVICE

I certify that on August 19, 2016, I electronically served this *Declaration of* [REDACTED] via ECF on the following:

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/s/ Nicole Simmons

Nicole Simmons