

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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VIRGINIA L. GIUFFRE,
Plaintiff,
v.
GHISLAINE MAXWELL,
Defendant.
-----X

15-cv-07433-RWS

**Declaration of Laura A. Menninger in Support of
Reply in Support of Defendant’s Motion to Compel**

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 in this action. I respectfully submit this Declaration in support of Ms. Maxwell’s Reply in Support of Defendant’s Motion to Compel Responses to Second Set of Discovery Requests, and for Sanctions.

2. On May 31, 2016, the defense propounded on Plaintiff a Second Set of Discovery Requests. Interrogatory No. 5 required Plaintiff to identify each communication she or her attorneys had with any media representative, including any reporter, freelance reporter, “newspaper person” or “any other employee of any media organization.” Request for Production

No. 1 required Plaintiff to produce all “Communications and Documents identified in [Interrogatory No. 5].”

3. On July 1, Plaintiff submitted her response to Interrogatory No. 5. She lodged multiple objections, including that the interrogatory “calls for the production of documents that are irrelevant to this action and not reasonably calculated to lead to the discovery admissible evidence.” “Notwithstanding” the objections, Plaintiff answered: “Ms. Giuffre has already produced her responsive communications” and referred the defense to 7,566 pages of documents. Plaintiff did not produce and has not produced any audio recording of a voicemail to Plaintiff’s counsel from any reporter, freelance reporter, newspaper person, or media employee.

4. Sharon Churcher is a reporter who has written numerous news articles about Plaintiff, Ms. Maxwell and Jeffrey Epstein. Doc.218, at 1. They were published in numerous publications, including the *National Enquirer*. *Id.* She wrote the articles either as an employee of the newspaper entity or as a freelance reporter. *Id.*

5. On June 23, 2016, my office obtained from Alan Dershowitz’s counsel an audio recording of a voicemail left by Ms. Churcher for Plaintiff’s counsel Paul Cassell. I understand Professor Dershowitz’s counsel obtained the audio recording in connection with litigation between Professor Dershowitz and Mr. Cassell. Plaintiff has never produced this audio recording in response to the defense’s discovery requests.

6. Exhibit A is a complete, true and accurate transcription of the voicemail. *See* Exhibit B.

7. Attached as Exhibit C (filed under seal) is a true and correct copy of Plaintiff’s Supplemental Responses to Defendant’s Interrogatories 6, 12 and 13.

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

Executed on August 25, 2016.

s/ Laura A. Menninger

Laura A. Menninger

CERTIFICATE OF SERVICE

I certify that on August 25, 2016, I electronically served this *Declaration of Laura A. Menninger in Support of Reply in Support of Defendant's Motion to Compel* via ECF on the following:

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/s/ Nicole Simmons

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