

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 Defendant's Motion  
For Sanctions Based On Plaintiff's Intentional Destruction Of Evidence**

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 Defendant's Motion for Sanctions Based on Plaintiff's Intentional Destruction of Evidence.

2. Attached as Exhibit A (filed under seal) is a true and correct copy of Plaintiff's Second Amended Supplemental Response and Objections to Defendant's First Set of Discovery Requests to Plaintiff, Interrogatory Response 3, dated April 29, 2016.

3. Attached as Exhibit B (filed under seal) are true and correct copies of excerpts [REDACTED]

[REDACTED]

[REDACTED]

4. Attached as Exhibit C (filed under seal) are true and correct copies of excerpts [REDACTED]

[REDACTED]

[REDACTED]

5. Attached as Exhibit D (filed under seal) is a true and correct copy of Plaintiff's Second Amended Supplemental Response and Objections to Defendant's First Set of Discovery Request to Plaintiff, dated April 29, 2016.

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

Dated: December 9, 2016.

*s/ Laura A. Menninger*

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Laura A. Menninger

**CERTIFICATE OF SERVICE**

I certify that on December 9, 2016, I electronically served this *Declaration of Laura A. Menninger in Support of Defendant's Motion For Sanctions Based on Plaintiff's Intentional Destruction of Evidence* via ECF on the following:

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/s/ Nicole Simmons

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