

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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VIRGINIA L. GIUFFRE,	⋮
Plaintiff,	
v.	15-cv-07433-RWS
GHISLAINE MAXWELL,	⋮
Defendant.	
-----X	

**Declaration of Laura A. Menninger in Support of  
Defendant's Motion For Summary Judgment**

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 Motion for Summary Judgment.<sup>1</sup>

2. Attached as Exhibit A is a true and correct copy of an article by Sharon Churcher entitled "Prince Andrew and the 17-year-old girl his sex offender flew to Britain to meet him," DAILY MAIL, dated March 2, 2011.

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<sup>1</sup> At trial, defendant intends to produce either the custodian of record relevant to any disputed document or a certification in compliance with either Fed. R. Evid. P. 803 and/or 902. See Fed. R. Civ. P. 56(c). Apart from deposition testimony, the majority of non-deposition documents herein were either produced by plaintiff or obtained with releases signed by plaintiff.

3. Attached as Exhibit B is a true and correct copy of an article by Sharon Churcher entitled “Teenage girl recruited by paedophile Jeffrey Epstein reveals how she twice met Bill Clinton,” DAILY MAIL, dated March 5, 2011.

4. Attached as Exhibit C is a true and correct copy of a statement on behalf of Ms. Maxwell dated March 9, 2011.

5. Attached as Exhibit D (filed under seal) [REDACTED]  
[REDACTED]  
[REDACTED]

6. Attached as Exhibit E is a true and correct copy of an Order Denying Motion to Join Under Rule 21, *Doe v. United States*, No. 08-80736-Civ-Marra/Johnson (S.D. Fla. Apr. 7, 2016).

7. Attached as Exhibit F is a true and correct copy of a statement on behalf of Ms. Maxwell dated January 2, 2015.

8. Attached as Exhibit G (filed under seal) [REDACTED]  
[REDACTED]  
[REDACTED]

9. Attached as Exhibit H (filed under seal) [REDACTED]  
[REDACTED]  
[REDACTED]

10. Attached as Exhibit I (filed under seal) [REDACTED]  
[REDACTED]  
[REDACTED]

11. Attached as Exhibit J (filed under seal) [REDACTED]

[REDACTED]

12. Attached as Exhibit K (filed under seal) [REDACTED]

[REDACTED]

13. Attached as Exhibit L (filed under seal) [REDACTED]

[REDACTED]

[REDACTED]

14. Attached as Exhibit M (filed under seal) [REDACTED]

[REDACTED]

15. Attached as Exhibit N (filed under seal) [REDACTED]

[REDACTED]

[REDACTED]

16. Attached as Exhibit O (filed under seal) [REDACTED]

[REDACTED]

[REDACTED]

17. Attached as Exhibit P (filed under seal) [REDACTED]

[REDACTED]

[REDACTED]

18. Attached as Exhibit Q (filed under seal) [REDACTED]

[REDACTED]

[REDACTED]

19. Attached as Exhibit R (filed under seal) [REDACTED]

[REDACTED]

[REDACTED]

20. Attached as Exhibit S (filed under seal) [REDACTED]

[REDACTED]

21. Attached as Exhibit T (filed under seal) [REDACTED]

[REDACTED]

22. Attached as Exhibit U (filed under seal) [REDACTED]

[REDACTED]

23. Attached as Exhibit V (filed under seal) [REDACTED]

[REDACTED]

24. Attached as Exhibit W (filed under seal) [REDACTED]

[REDACTED]

[REDACTED]

25. Attached as Exhibit X (filed under seal) [REDACTED]

[REDACTED]

26. Attached as Exhibit Y (filed under seal) [REDACTED]

[REDACTED]

[REDACTED]

27. Attached as Exhibit Z (filed under seal) [REDACTED]

[REDACTED]

28. Attached as Exhibit AA (filed under seal) [REDACTED]

[REDACTED]

29. Attached as Exhibit BB (filed under seal) [REDACTED]

[REDACTED]

30. Attached as Exhibit CC (filed under seal) [REDACTED]

[REDACTED]

[REDACTED]

31. Exhibit DD left intentionally blank.

32. Attached as Exhibit EE (filed under seal) [REDACTED]

[REDACTED]

33. Attached as Exhibit FF (filed under seal) [REDACTED]

[REDACTED]

34. Attached as Exhibit GG (filed under seal) [REDACTED]

[REDACTED]

[REDACTED]

35. Attached as Exhibit HH (filed under seal) [REDACTED]

[REDACTED]

36. Attached as Exhibit II (filed under seal) [REDACTED]

[REDACTED]

[REDACTED]

37. Attached as Exhibit JJ (filed under seal) [REDACTED]

38. Attached as Exhibit KK (filed under seal) [REDACTED]

39. Attached as Exhibit LL is a true and correct copy of the Victims Refuse Silence, Inc. Articles of Incorporation dated December 23, 2014, GIUFFRE001064-5.

40. Attached as Exhibit MM (filed under seal) [REDACTED]

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

Executed on January 6, 2017.

*s/ Laura A. Menninger*

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Laura A. Menninger

**CERTIFICATE OF SERVICE**

I certify that on January 6, 2017, I electronically served this *Declaration of Laura A. Menninger in Support of Defendant's Motion for Summary Judgment* via ECF on the following:

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