

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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

**Declaration of Laura A. Menninger in Support of  
Defendant's Motion *In Limine* To Exclude *In Toto* Certain  
Depositions Designated By Plaintiff For Use At Trial**

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 in Limine to Exclude In Toto Certain Depositions Designated by Plaintiff for Use at Trial.

2. Attached as Exhibit A (filed under seal) [REDACTED]

[REDACTED]

[REDACTED]

3. Attached as Exhibit B (filed under seal) [REDACTED]

4. Attached as Exhibit C (filed under seal) [REDACTED]

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

6. Attached as Exhibit E (filed under seal) [REDACTED]

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

Executed on January 27, 2017.

s/ Laura A. Menninger  
Laura A. Menninger

**CERTIFICATE OF SERVICE**

I certify that on January 27, 2017, I electronically served this *Declaration of Laura A. Menninger in Support of Defendant's Motion in Limine to Exclude In Toto Certain Depositions Designated by Plaintiff for Use at Trial* via ECF on the following:

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/s/ Nicole Simmons

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