UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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

Declaration of Laura A. Menninger in Support of Defendant's Response in Opposition to Plaintiff Giuffre's Motion to Present Testimony from Jeffrey Epstein for Purposes of Obtaining an Adverse Inference

- 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 Response in Opposition to Plaintiff Giuffre's Motion to Present Testimony from Jeffrey Epstein for Purposes of Obtaining an Adverse Inference.
 - 2. Attached as Exhibit A (filed under seal) are true and correct copies of

	3.	Attached as Exhibit B (filed under seal) are true and correct copies of			
	4.	Attached as Exhibit C (filed under seal)) is a true and correct copy of			
	5.	Attached as Exhibit D (filed under seal) is a true and correct copy			
I declare under penalty of perjury that the foregoing is true and correct.					
	Exe	ecuted on February 24, 2017.			
		s/ Laura A. Menninger Laura A. Menninger			

CERTIFICATE OF SERVICE

I certify that on February 24, 2017, I electronically served this *Declaration of Laura A*. *Menninger in Support of Defendant's Response in Opposition to Plaintiff Giuffre's Motion to Present Testimony from Jeffrey Epstein for Purposes of Obtaining an Adverse Inference* via ECF on the following:

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/s/ Nicole Simmons

Nicole Simmons