

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 in Limine  
to Exclude Deposition Testimony of Sarah Kellen and Nadia Marcinkova  
or Any Witness Invoking Their Fifth Amendment Privilege**

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 Deposition Testimony of Sarah Kellen and Nadia Marcinkova or Any Witness Invoking Their Fifth Amendment Privilege.

2. Attached as Exhibit A (filed under seal) are true and correct copies of [REDACTED]

[REDACTED]

[REDACTED]

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

Executed on March 3, 2017.

*s/ Laura A. Menninger*

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Laura A. Menninger

**CERTIFICATE OF SERVICE**

I certify that on March 3, 2017, I electronically served this *Declaration of Laura A. Menninger in Support of Defendant's Motion in Limine to Exclude Deposition Testimony of Sarah Kellen and Nadia Marcinkova or Any Witness Invoking Their Fifth Amendment Privilege* via ECF on the following:

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