

**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 Permit Questioning Regarding
Plaintiff's Sexual History and Reputation**

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 Permit Questioning Regarding Plaintiff's Sexual History and Reputation.

2. Attached as Exhibit A (filed under seal) is a true and correct copy of the [REDACTED]

[REDACTED]

[REDACTED]

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

[REDACTED]

[REDACTED]

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

[REDACTED]

[REDACTED]

5. Attached as Exhibit D (filed under seal) are true and correct copies of records from

[REDACTED]

6. Attached as Exhibit E (filed under seal) is a true and correct copy of the [REDACTED]

[REDACTED]

[REDACTED]

7. Attached as Exhibit F (filed under seal) are true and correct copies of records from

[REDACTED]

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

Executed on March 3, 2017.

s/ Laura A. Menninger

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 Permit Questioning Regarding Plaintiff's Sexual History and Reputation* via ECF on the following:

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/s/ Nicole Simmons

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