

**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 Response to  
Plaintiff's Motion to Present Testimony from Sarah Kellen and Nadia Marcinkova  
For Purposes of Obtaining an Adverse Inference Instruction**

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 to Plaintiff's Motion to Present Testimony from Sarah Kellen and Nadia Marcinkova For Purposes of Obtaining an Adverse Inference Instruction.

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

[REDACTED]

[REDACTED]

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

[REDACTED]

[REDACTED]

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

[REDACTED]

[REDACTED]

5. Attached as Exhibit D (filed under seal) is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

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

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

Executed on March 17, 2017.

s/ Laura A. Menninger

Laura A. Menninger

**CERTIFICATE OF SERVICE**

I certify that on March 17, 2017, I electronically served this *Declaration of Laura A. Menninger in Support of Defendant's Response to Plaintiff's Motion to Present Testimony from Sarah Kellen and Nadia Marcinkova For Purposes of Obtaining an Adverse Inference Instruction* via ECF on the following:

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*/s/ Nicole Simmons*

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Nicole Simmons