

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
VIRGINIA L. GIUFFRE,
Plaintiff,
v.
GHISLAINE MAXWELL,
Defendant.
-----X

15-cv-07433-RWS

**Declaration of Laura A. Menninger in Support of Defendant's Reply in Support of
Defendant's Motion in Limine to Exclude Late Disclosed Supplemental Report of Dr.
James Jansen and Video Trial Exhibit of Dr. Gilbert Kliman**

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 Reply in Support of Defendant's Motion in Limine to Exclude Late Disclosed Supplemental Report of Dr. James Jansen and Video Trial Exhibit of Dr. Gilbert Kliman.

2. Attached as Exhibit A are true and correct copies of composite of sampling of new articles from new websites.

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

Executed on March 24, 2017.

s/ Laura A. Menninger

Laura A. Menninger

CERTIFICATE OF SERVICE

I certify that on March 24, 2017, I electronically served this *Declaration of Laura A. Menninger in Support of Defendant's Reply in Support of Defendant's Motion in Limine to Exclude Late Disclosed Supplemental Report of Dr. James Jansen and Video Trial Exhibit of Dr. Gilbert Kliman* via ECF on the following:

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/s/ Nicole Simmons

Nicole Simmons