

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  
Motion to Appoint Special Master to Preside Over Third Deposition of Defendant**

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 to Appoint Special Master to Preside Over Third Deposition of Defendant.

2. Attached as Exhibit A are true and correct copies of [REDACTED]  
[REDACTED]

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

Executed on April 11, 2017.

*s/ Laura A. Menninger*  
\_\_\_\_\_  
Laura A. Menninger

**CERTIFICATE OF SERVICE**

I certify that on April 11, 2017, I electronically served this *Declaration of Laura A. Menninger in Support of Defendant's Motion to Appoint Special Master to Preside Over Third Deposition of Defendant* via ECF on the following:

Sigrid S. McCawley  
Meredith Schultz  
BOIES, SCHILLER & FLEXNER, LLP  
401 East Las Olas Boulevard, Ste. 1200  
Ft. Lauderdale, FL 33301  
smccawley@bsfllp.com  
mschultz@bsfllp.com

Bradley J. Edwards  
FARMER, JAFFE, WEISSING, EDWARDS,  
FISTOS & LEHRMAN, P.L.  
425 North Andrews Ave., Ste. 2  
Ft. Lauderdale, FL 33301  
brad@pathtojustice.com

Paul G. Cassell  
383 S. University Street  
Salt Lake City, UT 84112  
cassellp@law.utah.edu

J. Stanley Pottinger  
49 Twin Lakes Rd.  
South Salem, NY 10590  
StanPottinger@aol.com

/s/ Nicole Simmons

Nicole Simmons