

**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 Exclude  
Undisclosed Witnesses and Exhibits Pursuant to Fed. R. Civ. P. 37(c)**

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 Exclude Undisclosed Witnesses and Exhibits Pursuant to Fed. R. Civ. P. 37(c).

2. Attached as Exhibit A is a true and correct copy of [REDACTED]  
[REDACTED]

3. Attached as Exhibit B is a true and correct copy of [REDACTED]  
[REDACTED]

4. Attached as Exhibit C is a true and correct list of [REDACTED]

[REDACTED]

5. Attached as Exhibit D is a true and correct list of [REDACTED]

[REDACTED]

6. Attached as Exhibit E is a true and correct list of [REDACTED]

[REDACTED]

7. Attached as Exhibit F is a true and correct list of [REDACTED]

[REDACTED]

8. Attached as Exhibit G is a true and correct list of [REDACTED]

[REDACTED]

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

Executed on April 28, 2017.

*s/ Laura A. Menninger*

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Laura A. Menninger

**CERTIFICATE OF SERVICE**

I certify that on April 28, 2017, I electronically served this *Declaration of Laura A. Menninger in Support of Defendant's Motion to Exclude Undisclosed Witnesses and Exhibits Pursuant to Fed. R. Civ. P. 37(c)* via ECF on the following:

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