

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	X	
VIRGINIA L. GIUFFRE,	⋮	
Plaintiff,		
v.		15-cv-07433-RWS
GHISLAINE MAXWELL,	⋮	
Defendant.		
-----X	X	

**Declaration of Ty Gee in Support of Ms. Maxwell's
Motion for an Order to Show Cause re Protective Order**

I, Ty Gee, declare as follows:

1. I am an attorney at law duly licensed in the State of Colorado and admitted to practice in the United States District Court for the Southern District of New York *pro hac vice*. I am a member of the law firm Haddon, Morgan & Foreman, P.C., counsel of record for Defendant Ghislaine Maxwell ("Maxwell") in this action. I respectfully submit this declaration in support of Ms. Maxwell's Motion for an Order to Show Cause re Protective Ordwer.
2. Attached as Exhibit A is a true and correct copy of Ms. Menninger's correspondence to Ms. MCawley dated July 6, 2017.
3. Attached as Exhibit B is a true and correct copy of Mr. Cassell's correspondence to Ms. Menninger dated July 7, 2017.
4. Attached as Exhibit C is a true and correct copy of Ms. Menninger's correspondence to Ms. MCawley dated September 6, 2018.

5. Attached as Exhibit D is a true and correct copy of Mr. Cassell's correspondence to Ms. Menninger dated September 26, 2018.

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

Executed on December 4, 2018

s/ Ty Gee

CERTIFICATE OF SERVICE

I certify that on December 4, 2018, I electronically served this *Declaration Of Ty Gee In Support Of Ms. Maxwell's Motion for and Order to Show Cause re Protective Order* via ECF on the following:

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/s/ Nicole Simmons

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