

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 REPLY IN SUPPORT
OF MOTION TO COMPEL ALL ATTORNEY-CLIENT COMMUNICATIONS AND
ATTORNEY WORK PRODUCT
PLACED AT ISSUE BY PLAINTIFF AND HER ATTORNEYS**

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 Reply in Support of Motion To Compel All Attorney-Client Communications and Attorney Work Product Placed At Issue By Plaintiff And Her Attorneys.

2. Attached as Exhibit Q is a true and correct copy of portions of Defendant Ghislaine Maxwell's Responses and Objections to Plaintiff's Second Request for Production of Documents, served May 16, 2016.

3. Attached as Exhibit R is a true and correct copy the Complaint filed in *Jane Doe 102 v. Epstein*, Case 9:09-cv-80656-KAM, in the United States District Court for the Southern District of Florida, filed on May 1, 2009.

4. Attached as Exhibit S (filed under seal) is a true and correct copy of excerpts from the Deposition of Virginia Giuffre taken in the above captioned matter on May 3, 2016, and designated by Plaintiff as Confidential under the Protective Order.

By: /s/ Laura A. Menninger

Laura A. Menninger

CERTIFICATE OF SERVICE

I certify that on June 6, 2016, I electronically served this *Declaration Of Laura A. Menninger In Support Of Reply In Support Of Motion To Compel All Attorney-Client Communications And Attorney Work Product Placed At Issue By Plaintiff And Her Attorneys* via ECF on the following:

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

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

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

/s/ Nicole Simmons

Nicole Simmons