UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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VIRGINIA L. GIUFFRE,	
Plaintiff,	
V.	
GHISLAINE MAXWELL,	
Defendant.	
	X

15-cv-07433-RWS

Declaration Of Laura A. Menninger In Support Of Motion To Compel Non-Privileged Documents

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 ("Maxwell") in this action. I respectfully submit this declaration in support of Ms. Maxwell's Motions to Compel Non-Privileged Documents.

2. Attached as Exhibit A is a true and correct copy of Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated April 29, 2016, served on April 29, 2016.

3. Attached as Exhibit B is a subsection of items on Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated April 29, 2016 relating to media issues and press releases.

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4. Attached as Exhibit C is a subsection of items on Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated April 29, 2016 including J. Stanley Pottinger in the communications.

5. Attached as Exhibit D is a printout of the content of Stan Pottinger's Official Website, found on the internet at http://stanpottinger.com/home/index.asp

6. Attached as Exhibit E (filed under seal)

7. Attached as Exhibit F is a subsection of items on Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated April 29, 2016 that appear to attach or include preexisting non-privileged documents that have been withheld or are not identified.

8. Attached as Exhibit G is a subsection of items on Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated April 29, 2016 including unidentified third party "professionals" in the communications.

 Attached as Exhibit H is a subsection of items on Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated April 29, 2016 relating to communication regarding Victims Refuse Silence.

10. Attached as Exhibit I is a true and correct copy of the Articles of Organization for Victims Refuse Silence, Inc. available through the Florida Secretary of State website at http://search.sunbiz.org/Inquiry/CorporationSearch/ConvertTiffToPDF?storagePath=COR%5C2 014%5C1229%5C67499487.Tif&documentNumber=N14000011657.

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11. Attached as Exhibit J (filed under seal)

By: /s/ Laura A. Menninger Laura A. Menninger

CERTIFICATE OF SERVICE

I certify that on May 20, 2016, I electronically served this *Declaration Of Laura A*. *Menninger In Support Of Motion To Compel Non-Privileged Documents* 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@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 S.J. Quinney College of Law, University of Utah 383 S. University Street Salt Lake City, UT 84112 cassellp@law.utah.edu

/s/ Nicole Simmons

Nicole Simmons