

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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VIRGINIA L. GIUFFRE,
Plaintiff,

v.

GHISLAINE MAXWELL,
Defendant.

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15-cv-07433-RWS

**DECLARATION OF LAURA A. MENNINGER IN SUPPORT OF
DEFENDANT'S MOTION FOR PROTECTIVE ORDER**

I, Laura A. Menninger, declare that the below is true and correct to the best of my knowledge as follows:

1. I am a partner with the law firm of a Haddon, Morgan & Foreman, P.C. and duly licensed to practice in the States of New York and Colorado and admitted to practice in the United States District Court for the Southern District of New York.
2. I respectfully submit this Declaration in support of Ms. Maxwell's Motion for Protective Order in this action.
3. Attached hereto as Exhibit A is a proposed Protective Order.

Dated: March 2, 2016.

Respectfully submitted,

s/ Laura A. Menninger

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CERTIFICATE OF SERVICE

I certify that on March 2, 2016, I electronically filed this *Declaration of Laura A. Menninger in Support of Defendant's Motion for a Protective Order* with the Clerk of Court using the CM/ECF system which will send notification to all counsel of record including the following:

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s/ Brenda Rodriguez
Brenda Rodriguez