

**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 RESPONSE TO
PLAINTIFF’S MOTION TO COMPEL PRODUCTION
OF DOCUMENTS SUBJECT TO IMPROPER PRIVILEGE**

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 and Foreman. P.C., counsel of record for Defendant Ghislaine Maxwell (“Maxwell”) in this action. I respectfully submit this declaration in support of Maxwell’s Response to Plaintiff’s Motion to Compel the Production of Documents Subject to Improper Privilege.

2. Attached as Exhibit A is a true and correct copy of the statement dated January 2, 2015, issued by Ross Gow on behalf of Ghislaine Maxwell.

3. Attached as Exhibit B is a true and correct copy of the attorney profile for Brett D. Jaffe of Alston & Bird, formerly of Cohen & Gresser, LLP.

4. Attached as Exhibit C is a true and correct copy of the attorney profile for Mark S. Cohen of Cohen & Gresser, LLP.

5. Attached as Exhibit D is a true and correct copy of the profile for Philip Barden of Devonshires Solicitors.

6. Attached as Exhibit E is a true and correct copy of Affidavit of Ghislaine Maxwell and two pertinent exhibits.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 7, 2016 in Denver, Colorado.

By: */s/ Laura A. Menninger*

Laura A. Menninger