

**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 Motion To Compel
Responses to Defendant's First Set of Discovery Requests to Plaintiff**

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 Responses to Defendant's First Set of Discovery Requests to Plaintiff.

2. Attached as Exhibit A is a true and correct copy of Plaintiff's Amended Supplemental Response and Objections to Defendant's First Set of Discovery Requests to Plaintiff, served on March 22, 2016.

3. Attached as Exhibit B is a true and correct copy of Plaintiff, Virginia Giuffre's Revised Disclosure Pursuant to Fed. R. Civ. P. 26, served on March 11, 2016.

4. Attached as Exhibit C is a true and correct copy of the Confidentiality Order issued in *Edwards and Cassell v. Dershowitz*, 15-000072, (17th Judicial District, Broward County, Florida).

5. I further certify that document bates numbered GIUFFRE003714 produced by Plaintiff in this matter is an email from Plaintiff to Sharon Churcher, a member of the media. The email shows that it includes an attachment. No attachment has been produced. The email is not being included herewith because Plaintiff marked it as “confidential.”

By: /s/ Laura A. Menninger

Laura A. Menninger

CERTIFICATE OF SERVICE

I certify that on March 31, 2016, I electronically served this *DECLARATION OF LAURA A. MENNINGER IN SUPPORT OF MOTION TO COMPEL RESPONSES TO DEFENDANT'S FIRST SET OF DISCOVERY REQUESTS TO PLAINTIFF* via ECF on the following:

Sigrid S. McCawley
BOIES, SCHILLER & FLEXNER, LLP
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Ft. Lauderdale, FL 33301
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/s/ Nicole Simmons

Nicole Simmons