

**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 Further 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 Defendant's Reply In Support of Motion to Compel Responses to Defendant's First Set of Discovery Requests to Plaintiff.

2. On April 5, 2016, I spoke by telephone with Assistant United States Attorney Marie Villafana, counsel of record in *Jane Doe #1 and Jane Doe #2 v. United States*, #08-80736-CIV, pending in the United States District Court for the Southern District of Florida, otherwise known as the Crime Victims Rights Act case.

3. Ms. Villafana advised me that her office is not conducting any criminal investigation of Ms. Ghislaine Maxwell. She also advised me that she is unaware of any law

enforcement agency who is conducting an active criminal investigation of Ghislaine Maxwell.

4. Attached as Exhibit D is a true and correct copy of pages 1, 16 and 17 from Plaintiff's Revised Disclosure Pursuant to Fed. R. Civ. P. 26.

By: /s/ Laura A. Menninger

Laura A. Menninger

### **CERTIFICATE OF SERVICE**

I certify that on April 11, 2016, I electronically served this *DECLARATION OF LAURA A. MENNINGER IN FURTHER SUPPORT OF MOTION TO COMPEL RESPONSES TO DEFENDANT'S FIRST SET OF DISCOVERY REQUESTS TO PLAINTIFF* via ECF on the following:

Sigrid S. McCawley  
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/s/ Nicole Simmons

Nicole Simmons