

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 All Attorney-Client Communications and Attorney
Work Product Placed At Issue by Plaintiff and Her Attorneys**

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 All Attorney-Client Communications and Attorney Work Product Placed At Issue by Plaintiff and Her Attorney.

2. Attached as Exhibit A is a true and correct copy of excerpts categorically logged entries from Plaintiff Giuffre's Revised Supplemental Privilege Log dated April 29, 2016.

3. Attached as Exhibit B is a true and correct copy of Plaintiff Giuffre’s Discovery Second Amended Supplemental Response to Interrogatory No. 3 concerning her attorney representations, dated April 29, 2016.

4. Attached as Exhibit C (filed under seal) is a true and correct copy of the Motion to Join in the *Jane Doe #1 and Jane Doe #2 v. United States*, Case No. 08-80736-CIV-Marra, United States District Court for the Southern District of Florida (“CVRA Case”) filed December 30, 2014.

5. Attached as Exhibit D is a true and correct copy of the Order in the CVRA Case dated April 6, 2015.

6. Attached as Exhibit E is a true and correct copy of the Motion for Summary Judgment in the *Edwards and Cassell v. Dershowitz*, Case No. 15-00072, In and for the Seventeenth Judicial District, Broward County, Florida (“Dershowitz Case”) dated November 25, 2015.

7. Attached as Exhibit F is a true and correct copy of the Complaint in the Dershowitz Case dated January 6, 2015.

8. Attached as Exhibit G is a true and correct copy of the Notice of Serving Answers to Interrogatories in Dershowitz Case dated March 13, 2015.

9. Attached as Exhibit H (filed under seal) is a true and correct copy of excerpts from the Deposition of Virginia Giuffre taken in the [REDACTED] matter on January 16, 2016, and designated by Plaintiff as Confidential under the Protective Order.

10. Attached as Exhibit I is a true and correct copy of the Declaration of Virginia Giuffre in the Dershowitz Case dated November 20, 2015.

11. Attached as Exhibit J (filed under seal) is a true and correct copy of Email correspondence with Churcher re: Edwards Privilege communication.

12. Attached as Exhibit K (filed under seal) is a true and correct copy of excerpts from the Deposition of Virginia Giuffre taken in the above captioned matter on May 3, 2016, and designated by Plaintiff as Confidential under the Protective Order.

13. Attached as Exhibit L is a true and correct copy of the October 16, 2015 Deposition of Paul G. Cassell taken in the *Edwards and Cassell v. Dershowitz*, In and for the Seventeenth Judicial District, Broward County, Florida matter.

14. Attached as Exhibit M is a true and correct copy of the press release issued by the parties in the Dershowitz Case on April 8, 2016.

15. Attached as Exhibit N is a true and correct copy of the interview of Virginia Roberts by Edwards and Scarola in the *Epstein v. Rothstein, Edwards, and L.M.*, In and for the Fifteenth Judicial District, Palm Beach County, Florida (“Epstein Case”).

16. Attached as Exhibit O is a true and correct copy of the May 17, 2011 Notice of Filing of the interview in the Epstein Case.

17. Attached as Exhibit P is a true and correct copy of a portion of the ECF Docket Sheet in the CVRA Case.

18. Attached as Exhibit Q is a true and correct copy of the document produced by Plaintiff in this matter as GIUFFRE000862-000887.

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

CERTIFICATE OF SERVICE

I certify that on May 26, 2016, I electronically served this *Declaration Of Laura A. Menninger In Support Of Motion To Compel All Attorney-Client Communications and Attorney Work Product Placed At Issue by Plaintiff and her Attorney* via ECF on the following:

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/s/ Nicole Simmons

Nicole Simmons