

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
VIRGINIA L. GIUFFRE,  
Plaintiff,  
v.  
GHISLAINE MAXWELL,  
Defendant.  
-----X

**15-cv-07433-LAP**

**DECLARATION OF LAURA A. MENNINGER**

I, Laura A. Menninger, declare as follows:

1. I represent Ghislaine Maxwell in the above-captioned matter.
2. Pursuant to this Court’s August 26, 2020 Order (Doc. #1107), directing the Original Parties to serve Non-Party Notices on all remaining Non-Parties, as well as to Does 1 and 2 at newly obtained addresses, and after conferral with Plaintiff’s counsel, undersigned counsel agreed to serve Non-Party Notices to J. Doe 1 through J. Doe 92.
3. Pursuant to the Order and Protocol for Unsealing Decided Motions (Doc. # 1108), I used best efforts to obtain the most current addresses for J. Does 1 through J. Doe 92.
4. I mailed each of the following documents to the Non-Parties listed below in the manner described below: (1) Notice to Non-Parties of Possible Unsealing of Sealed Documents (Doc. # 1044); (2) Non-Party’s Request for Excerpts of Sealed Documents and Acknowledgement of Court Order and Protocol Governing the Excerpts (*Id.*); (3) Non-Party’s

Objection to Unsealing (*Id.*); and (4) Order and Protocol for Unsealing Decided Motions (Updated August 27, 2020) (Doc. # 1108) (collectively, “Non-Party Notices”).

5. On September 11, 2020, I sent Non-Party Notices via first-class certified mail (return receipt requested) and, for international addresses via UPS, to the following Non-Parties:

- J. Does 1 – 9
- J. Does 11 – 23
- J. Does 25 – 28
- J. Doe 30
- J. Doe 32
- J. Doe 34 – 39
- J. Doe 41 – 45
- J. Doe 47 – 50
- J. Doe 52 – 58
- J. Doe 60
- J. Doe 63 – 73
- J. Doe 75 – 76
- J. Doe 78 – 79
- J. Doe 82 – 84
- J. Doe 89 – 92
- J. Doe 105

6. On September 11, I sent Non-Party Notices via e-mail to the following Non-Parties for whom only an email address was available despite best efforts to locate a physical address:

- J. Doe 10
- J. Doe 77
- J. Doe 81

7. For the following Non-Parties, I have not been able to locate an address and therefore have not provided them a Non-Party Notice:

- J. Doe 29
- J. Doe 31
- J. Doe 33
- J. Doe 40
- J. Doe 46
- J. Doe 51

- J. Doe 61 – 62
- J. Doe 74
- J. Doe 80
- J. Doe 85
- J. Doe 86
- J. Doe 88

8. I have not sent a Non-Party to the following Non-Parties who are deceased:

- J. Doe 24
- J. Doe 59
- J. Doe 87

I hereby declare under penalty of perjury that the foregoing statements are true and correct.

Dated: September 11, 2020.

Respectfully submitted,

*s/ Laura A. Menninger*

---

Laura A. Menninger (LM-1374)

Jeffrey S. Pagliuca (*pro hac vice*)

Ty Gee (*pro hac vice*)

HADDON, MORGAN AND FOREMAN, P.C.

150 East 10<sup>th</sup> Avenue

Denver, CO 80203

Phone: 303.831.7364

Fax: 303.832.2628

lmenninger@hmflaw.com

*Attorneys for Ghislaine Maxwell*