

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
Reply to Plaintiff’s Opposition to Defendant’s Motion for Rule 37(b) Sanctions**

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 Reply to Plaintiff’s Opposition to Defendant’s Motion for Rule 37(b) Sanctions.

2. Attached as Exhibit O (filed under seal) are true and correct copies of **medical records bates labeled GIUFFRE 6631-6635, designated as Confidential under the Protective Order.**

3. Attached as Exhibit P (filed under seal) are true and correct copies of excerpts **from the deposition of Plaintiff Virginia Giuffre, designated as Confidential under the Protective Order.**

4. Attached as Exhibit Q (filed under seal) is a true and correct copy of a subpoena served on Dr. Steven Olson on April 6, 2016.

5. Attached as Exhibit R (filed under seal) is a chart reflecting Plaintiff's counsel's statements concerning their production of health care providers' identities and records.

6. Attached as Exhibit S is a true and correct copy of letters from Meredith Schultz to Laura Menninger dated May 25, 2016 and June 1, 2016, producing documents by Plaintiff bates labeled GIUFFRE 005439- 005606.

7. Attached as Exhibit T (filed under seal) is a true and correct copy of GIUFFRE 006636 produced on June 28, 2016 by Plaintiff and designated as Confidential under the Protective Order.

Dated: July 8, 2016

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

CERTIFICATE OF SERVICE

I certify that on July 8, 2016, I electronically served this *Declaration Of Laura A.*

Menninger In Support Of Reply to Plaintiff's Opposition to Defendant's Motion for Rule 37(b)

Sanctions via ECF on the following:

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/s/ Nicole Simmons

Nicole Simmons