

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 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 in this action. I respectfully submit this declaration in support of Reply in Support of Motion To Compel All Attorney-Client Communications and Attorney Work Product Placed At Issue By Plaintiff And Her Attorneys.

2. Attached as Exhibit Q is a true and correct copy of portions of Defendant Ghislaine Maxwell's Responses and Objections to Plaintiff's Second Request for Production of Documents, served May 16, 2016.

3. Attached as Exhibit R is a true and correct copy the Complaint filed in *Jane Doe 102 v. Epstein*, Case 9:09-cv-80656-KAM, in the United States District Court for the Southern District of Florida, filed on May 1, 2009.

4. Attached as Exhibit S (filed under seal) [REDACTED]
[REDACTED]
[REDACTED]

By: /s/ Laura A. Menninger

Laura A. Menninger

CERTIFICATE OF SERVICE

I certify that on June 6, 2016, I electronically served this *Declaration Of Laura A. Menninger In Support Of Reply In Support Of Motion To Compel All Attorney-Client Communications And Attorney Work Product Placed At Issue By Plaintiff And Her Attorneys* via ECF on the following:

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/s/ Nicole Simmons

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