

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT NEW YORK

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VIRGINIA GIUFFRE,

Plaintiff,

- against -

GHISLAINE MAXWELL,

Defendant.
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Index No. 15 Civ. 7433-RWS

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ECF CASE

DECLARATION OF LAURA R. HANDMAN

Pursuant to 28 U.S.C. § 1746, I, LAURA R. HANDMAN, declare and state as follows:

1. I am a member of the law firm of Davis Wright Tremaine LLP and a member of the Bar of the State of New York and of this Court. I submit this declaration in support of the motion (the "Motion") of my client, non-party Sharon Churcher, to quash the subpoena served on her on June 4, 2016 by the defendant in this case, Ghislaine Maxwell. A true and correct copy of that subpoena (the "Subpoena") is attached hereto as Exhibit A.

2. On June 9, 2016, I spoke by telephone to counsel for Ms. Maxwell, Laura Menninger. I asked Ms. Menninger if the defendant would be willing to postpone the date of compliance for the Subpoena (June 16, 2016), which was just twelve days after it had been served. I also stated that the documents called for by the Subpoena were protected from compelled disclosure by the New York Shield Law, N.Y. Civ. R. L. § 79-h. In light of that, I asked what specific information the defendant was seeking to elicit from Ms. Churcher.

3. Ms. Menninger stated that she could not provide more detail about what specific information she was seeking from Ms. Churcher because of a protective order in this case. She

also stated that her client would consent to adjourn the date of compliance only if Ms. Churcher was intending to comply with the Subpoena rather than move to quash.

4. Because the Subpoena calls for documents and information for which Ms. Churcher is bound by confidentiality (in addition to non-confidential newsgathering information that is also protected by the Shield Law), I could not agree to this condition. Accordingly, the compliance date for the Subpoena remains June 16, 2016.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this 15th day of June, 2016 in Washington, D.C.



Laura R. Handman