

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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VIRGINIA L. GIUFFRE,	:
	:
Plaintiff,	:
v.	:
	:
GHISLAINE MAXWELL,	:
	:
Defendant.	:
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15-cv-07433-RWS

**Declaration of [REDACTED]**

I, [REDACTED], declare as follows:

1. I am an attorney at law duly licensed in the State of New York.
2. I am familiar generally with the subject matter of this action, No. 15-cv-07433-RWS (S.D.N.Y.).
3. Before, during and subsequent to April 2015, I was representing [REDACTED] in specific ongoing legal matters. As of that time, [REDACTED] and Ghislaine Maxwell were parties to a [REDACTED], to which I am a party as [REDACTED].
4. As [REDACTED] legal counsel, I consider [REDACTED] and [REDACTED] lawyers and Ms. Maxwell and her lawyers to have a [REDACTED] under the [REDACTED] with respect to the plaintiff Virginia Giuffre's allegations relating to [REDACTED] in "sexual trafficking" and related matters.
5. During the course of my representation of [REDACTED], my communication with Ms. Menninger, including email communication, has involved the exchange of information that I deem to be attorney work product because it implicates my or Ms. Menninger's or both of our

mental impressions, conclusions, opinions and/or theories concerning legal matters within the

[REDACTED]

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

Executed on August 19, 2016.

[REDACTED]

**CERTIFICATE OF SERVICE**

I certify that on August 19, 2016, I electronically served this *Declaration of* [REDACTED]  
via ECF on the following:

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*/s/ Nicole Simmons*

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Nicole Simmons