

# **EXHIBIT B**

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 Nicole D. Simmons**

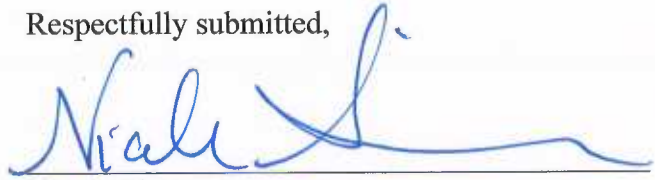
I, Nicole D. Simmons, declare as follows:

1. I am a Legal Assistant of the law firm Haddon, Morgan & Foreman, P.C.
2. I prepared the transcript attached as Exhibit A to Declaration of Laura A. Menninger in Support of Reply In Support of Motion to Compel Responses to Second Set of Discovery Requests, and for Sanctions
3. I prepared the transcript from a digital audio recording provided to me. I understand the recording is a voicemail left by Sharon Churcher for Paul Cassell.
4. Exhibit A to the Menninger Declaration is a complete, true and accurate transcription of the digital recording.

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

Executed this 25<sup>th</sup> day of August 2016.

Respectfully submitted,



Nicole Simmons  
HADDON, MORGAN AND FOREMAN, P.C.  
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Phone: 303.831.7364  
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STATE OF COLORADO

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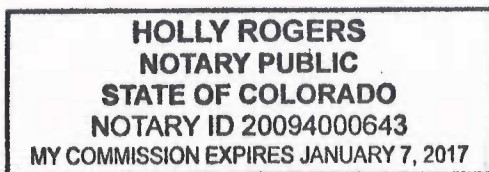
) ss.

COUNTY OF DENVER

)

Subscribed and sworn to before me by Nicole Simmons on this 25th day of August, 2016.

Witness my hand and official seal.



Notary Public  
My commission expires:

01/07/2017