

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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VIRGINIA L. GIUFFRE,

Plaintiff,

v.

15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendant.

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**Declaration of Laura A. Menninger in Support of
Response in Opposition to Plaintiff's Omnibus Motion *in Limine***

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 Ms. Maxwell's Response in Opposition to Plaintiff's Omnibus Motion *in Limine*.

2. Attached as Exhibit A is a true and correct copy of a statement on behalf of Ms. Maxwell dated January 2, 2015.

3. Attached as Exhibit B is a true and correct copy of an article by Sharon Churcher titled "Teenage girl recruited by paedophile Jeffrey Epstein reveals how she twice met Bill Clinton," DAILY MAIL, dated March 5, 2011.

4. Attached as Exhibit C (filed under seal) are true and correct copies of [REDACTED]

5. Attached as Exhibit D (filed under seal) are true and correct copies of [REDACTED]

6. Attached as Exhibit E (filed under seal) are true and correct copies of [REDACTED]

7. Attached as Exhibit F (filed under seal) is a true and correct copy of [REDACTED]

8. Attached as Exhibit G is a true and correct copy of an article by Sharon Churcher titled "The Prince, a paedophile and the sex slave teen" The Daily Telegraph, dated February 28, 2011.

9. Attached as Exhibit H (filed under seal) is a true and correct copy of [REDACTED]

10. Attached as Exhibit I is a true and correct copy of an article titled "Buckingham Palace issues second denial of underage sex claims against Prince Andrew," Fox News.com.

11. Attached as Exhibit J is a true and correct copy of an article titled "Prince Andrew denies sex abuse claims" CNN.com.

12. Attached as Exhibit K is a true and correct copy of an article by Tom Leonard titled “Prince Andrew risks ambassador job as underage sex case girl reveals meeting him” DAILY MAIL, dated March 2, 2011.

13. Attached as Exhibit L is a true and correct copy of an article by Wills Robinson titled “Jeffrey Epstein ‘sex slave’ Virginia Roberts was a ‘money-hungry sex kitten’, ex friends claim” DAILY MAIL, dated March 1, 2015.

14. Attached as Exhibit M (filed under seal) are true and correct copies of [REDACTED]

[REDACTED]

15. Attached as Exhibit N (filed under seal) is a true and correct copy of [REDACTED]

[REDACTED]

16. Attached as Exhibit O (filed under seal) is a true and correct copy of [REDACTED]

[REDACTED]

17. Attached as Exhibit P (filed under seal) are true and correct copies [REDACTED]

[REDACTED]

18. Attached as Exhibit Q (filed under seal) is a true and correct copy of [REDACTED]

[REDACTED]

19. Attached as Exhibit R is a true and correct copy of a press release in the *Edwards, et. al v. Dershowitz* matter, dated April 8, 2016, Bates stamped GM_00523-4.

20. Attached as Exhibit S is a true and correct copy of an Order Denying Motion to Join Under Rule 21, *Doe v. United States*, No. 08-80736-Civ-Marra/Johnson (S.D. Fla. Apr. 7, 2016).

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

Executed on March 17, 2017.

s/ Laura A. Menninger

Laura A. Menninger

CERTIFICATE OF SERVICE

I certify that on March 17, 2017, I electronically served this *Declaration of Laura A. Menninger in Support of Defendant's Response in Opposition to Plaintiff's Omnibus Motion in Limine* via ECF on the following:

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/s/ Nicole Simmons

Nicole Simmons