

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
VIRGINIA L. GIUFFRE,
Plaintiff,
v.
GHISLAINE MAXWELL,
Defendant.
-----X

15-cv-07433-RWS

**Declaration of Laura A. Menninger in Support of Defendant's Renewed
Motion to Produce Documents and Respond to Deposition Questions
and to Complete Search of ESI**

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 Renewed Motion to Compel Non-Party Witness to Produce Documents and to Respond to Deposition Questions and Complete Search of ESI.

2. Attached as Exhibit A is a true and correct copy of [REDACTED]

[REDACTED]

3. Attached as Exhibit B is a true and correct copy of [REDACTED]

[REDACTED]

4. Attached as Exhibit C are true and correct copies of [REDACTED]

[REDACTED]

5. Attached as Exhibit D is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

6. Attached as Exhibit E is a true and correct copy of [REDACTED]

[REDACTED]

7. Attached as Exhibit F are a list of additional proposed search terms for purposes of a search of Ms. Ransome's ESI.

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

Executed on April 20, 2017.

s/ Laura A. Menninger

Laura A. Menninger

CERTIFICATE OF SERVICE

I certify that on April 20, 2017, I electronically served this *Declaration of Laura A. Menninger in Support of Defendant's Renewed Motion to Compel Non-Party Witness to Respond to Deposition Questions and Complete Search of ESI* via ECF on the following:

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/s/ Holly Rogers

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