

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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

**15-cv-07433-RWS**

**Declaration Of Laura A. Menninger In Support Of  
Defendant's Submission Regarding "Search Terms" And Notice Of Compliance With  
Court Order Concerning Forensic Examination Of Computer Devices**

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 (“Maxwell”) in this action. I respectfully submit this declaration in support of Reply to Plaintiff’s Opposition to Defendant’s Motion To Reopen Plaintiff’s Deposition.

2. Attached as Exhibit A (filed under seal) is a true and correct copy of correspondence from Meredith Schultz to me dated June 30, 2016.

3. Attached as Exhibit B (filed under seal) is a true and correct copy of correspondence from me to Meredith Schultz dated July 14, 2016.

4. Attached as Exhibit C (filed under seal) is a true and correct copy of correspondence from me to Meredith Schultz dated July 18, 2016.

5. Attached as Exhibit D (filed under seal) is a true and correct copy of correspondence from me to Meredith Schultz dated July 19, 2016.

6. Attached as Exhibit E (filed under seal) is a true and correct copy of correspondence from Meredith Schultz to me dated July 20, 2016.

7. Attached as Exhibit F (filed under seal) are the search terms utilized by the Defendant in searching her devices.

8. I employed a licensed and certified forensic examiner to image Ms. Maxwell's laptop computer and mobile phone. The forensic examiner also captured all email on the servers for Ms. Maxwell's personal and business email accounts. He ran search terms against those images as directed by me and reflected in Exhibit F.

9. I reviewed approximately 6,000 documents that were captured using the search terms listed in Exhibit F from one or more of Ms. Maxwell's devices and email accounts. Apart from privileged documents related to this case, none of the documents captured were responsive to Plaintiff's discovery requests. The privileged documents were added to Ms. Maxwell's privilege log.

10. My law partner and co-counsel, Jeffrey Pagliuca, reviewed approximately 3,500 documents that were captured using the search terms listed in Exhibit F from one or more of Ms. Maxwell's devices and email accounts. Apart from privileged documents related to this case, none of the documents captured were responsive to Plaintiff's discovery requests.

11. I reviewed all documents contained within the [REDACTED] account. There were no responsive documents contained in that account.

12. I also reviewed two devices (an iPhone and an iPad) that Ms. Maxwell uses for reading periodicals and newspapers but does not use for email communications, text messaging

or other document transmissions or photography. Those devices did not contain any responsive documents.

Dated: August 1, 2016

By: /s/ Laura A. Menninger

Laura A. Menninger

**CERTIFICATE OF SERVICE**

I certify that on August 1, 2016, I electronically served this Declaration Of Laura A. Menninger In Support Of Defendant's Submission Regarding "Search Terms" And Notice Of Compliance With Court Order Concerning Forensic Examination Of Computer Devices via ECF on the following:

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/s/ Nicole Simmons  
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