

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 Laura A. Menninger in Support of  
Defendant's Reply in Support of Motion *In Limine* To Exclude *In Toto*  
Certain Depositions Designated By Plaintiff For Use At Trial**

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 Reply to her Motion in Limine to Exclude In Toto Certain Depositions Designated by Plaintiff for Use at Trial.

2. Attached as Exhibit F (filed under seal) are true and correct copies of excerpts from the deposition of [REDACTED] on June 20, 2016, designated Confidential under the Protective Order.

Executed on February 17, 2017.

*s/ Laura A. Menninger*

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Laura A. Menninger

**CERTIFICATE OF SERVICE**

I certify that on February 17, 2017, I electronically served this *Declaration of Laura A. Menninger in Support of Defendant's Reply in Support of Motion in Limine to Exclude In Toto Certain Depositions Designated by Plaintiff for Use at Trial* via ECF on the following:

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/s/ Nicole Simmons

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