

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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VIRGINIA L. GIUFFRE,

Plaintiff,
v.

GHISLAINE MAXWELL,
Defendant.

15-cv-07433-LAP

**Declaration of Laura A. Menninger in Further Support of Ms. Maxwell’s
Objections to Unsealing Sealed Materials Related to
Docket Entries 231, 279, 315, 320, & 335**

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 further support of Ms. Maxwell’s Objections to Unsealing Sealed Materials Related to Docket Entries 231, 279, 315, 320, & 335.
2. Attached as Exhibit E (Filed Under Seal) is true and correct copy of DE 340-1 with Ms. Maxwell’s Proposed Redactions as described in her Reply Memorandum.
3. Attached as Exhibit F is an Amended summary chart of Ms. Maxwell’s and Plaintiff’s Position on Docket Entries 231, 279, 315, 320, & 335. Ms. Maxwell amended her original chart to, *inter alia*, include Plaintiff’s position, to correct some entries wherein the

Second Circuit had already released some of the materials at issue, and to include information (where appropriate) that a Non-Party had not received Notice of the Protocol.

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

Executed on December 1, 2020.

By: /s/ Laura A. Menninger
Laura A. Menninger

CERTIFICATE OF SERVICE

I certify that on December 1, 2020, I electronically served this *Declaration of Laura A. Menninger in further support of Ms. Maxwell's Objections to Unsealing Sealed Materials Related to Docket Entries 231, 279, 315, 320, & 335* via ECF on the following:

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/s/ Nicole Simmons

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