

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 GHISLAINE MAXWELL'S MOTION TO DISMISS COMPLAINT**

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 and Foreman. P.C., counsel of record for Defendant Ghislaine Maxwell ("Maxwell") in this action. I respectfully submit this declaration in support of Maxwell's Motion to Dismiss the Complaint filed in this action by Plaintiff Virginia L. Giuffre.

2. Attached hereto as Exhibit A is a true and correct copy of the article, "Prince Andrew and the 17-year-old Girl His Sex Offender Friend Flew to Britain to Meet Him," *Daily Mail.Com*, Mar. 2, 2011, available at <http://www.dailymail.co.uk/news/article-1361039/Prince-Andrew-girl-17-sex-offender-friend-flew-Britain-meeet-him.html> (last visited Nov. 30, 2015).

3. Attached hereto as Exhibit B is a true and correct copy of “Statement on Behalf of Ghislaine Maxwell,” *PR Hub*, Mar. 9, 2011, available at <http://pr.gaeatimes.com/statement-on-behalf-of-ghislaine-maxwell-42551/> (last visited Nov. 30, 2015).

4. Attached hereto as Exhibit C is a true and correct copy of Order Denying Petitioner’s Motion to Join Under Rule 21 and Motion to Amend Under Rule 15, *Jane Doe 1 and Jane Doe 2 v. U.S.A.*, Case No. 08-cv-80736-KAM (S.D. Fla. Apr. 15, 2008) (Doc. No. 324).

5. Attached hereto as Exhibit D is a true and correct copy of Supplemental Order, *Jane Doe 1 and Jane Doe 2 v. U.S.A.*, Case No. 08-cv-80736-KAM (S.D. Fla. Apr. 15, 2008) (Doc. No. 325).

6. Attached hereto as Exhibit E is a true and correct copy of “Prince Andrew denies having relations with ‘sex slave’ girl,” *The Telegraph*, Jan. 3, 2015, available at <http://www.telegraph.co.uk/news/uknews/theroyalfamily/11323872/Prince-Andrew-denies-having-relations-with-sex-slave-girl.html> (last visited Nov. 30, 2015).

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 30, 2015 in Denver, Colorado.

s/ Laura A. Menninger

Laura A. Menninger