

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :
: 20 Cr. 330 (PAE)
v. :
: GHISLAINE MAXWELL, :
: Defendant. :
:----- X

**DECLARATION OF JEFFREY S. PAGLIUCA AND LAURA A.
MENNINGER IN SUPPORT OF MOTION TO WITHDRAW AS CO-
COUNSEL**

We, **JEFFREY S. PAGLIUCA AND LAURA A. MENNINGER**, declare as follows:

1. We are partners at the law firm Haddon, Morgan & Foreman, P.C. (“HMF”), co-counsel for defendant Ghislaine Maxwell. We are fully familiar with the facts set forth herein and respectfully submit this declaration pursuant to Local Civil Rule 1.4, Local Criminal Rule 1.1(b) (making Local Civil Rule 1.4 applicable to criminal proceedings), and Local Criminal Rule 1.2, in support of HMF’s motion to withdraw as co-counsel for defendant Ghislaine Maxwell in the above-captioned matter.

2. Ms. Maxwell retained HMF to represent her in the above-captioned case. We filed notice of appearances on July 8, 2020. HMF represented Ms. Maxwell at trial and through her sentencing on June 28, 2022.

3. Ms. Maxwell’s sentencing concluded her district court proceedings. Ms. Maxwell filed a notice of appeal on July 7, 2022. HMF did not represent Ms. Maxwell in her appellate proceedings.

4. On July 18, 2025, Deputy Attorney General Todd Blanche appeared in this case on behalf of the government and filed a motion to unseal grand jury transcripts.

5. On July 22, 2025, David Markus and Melissa Madrigal of Markus Moss PLLC (“Markus Moss”) appeared as counsel of record in this case for Ms. Maxwell.

6. We have spoken with Mr. Markus who has confirmed that Ms. Maxwell has retained Markus Moss to handle the government’s unsealing motion and that he is prepared to meet any deadlines imposed by the Court.

7. Mr. Markus has also informed us that he has discussed this motion with Ms. Maxwell and she consents to HMF’s withdrawal from this matter.

8. HMF is not asserting any liens in this matter and will share its files with Markus Moss upon request, subject to the conditions imposed by the protective order in this case (Dkt. No. 36).

9. HMF has served a copy of this declaration and its notice of motion to withdraw on Ms. Maxwell via Mr. Markus.

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

Dated: August 6, 2025.

Respectfully submitted,

s/ Jeffrey S. Pagliuca
s/ Laura A. Menninger
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Attorneys for Ghislaine Maxwell