

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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VIRGINIA L. GIUFFRE,

Plaintiff,

v.

15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendant.

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**Declaration Of Laura A. Menninger In Support Of Defendant's Motion  
to Reopen Deposition of Plaintiff Virginia Giuffre**

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 Defendant's Motion to Reopen Deposition of Plaintiff Virginia Giuffre.

2. Attached as Exhibit A is a true and correct copy of the transcript of the hearing held before this Court on April 21, 2016.

3. Attached as Exhibit B is a true and correct copy of a letter from Laura A. Menninger to Sigrid McCawley dated April 25, 2016 concerning discovery.

4. Attached as Exhibit C is a true and correct copy of Plaintiff's Second Amended Supplemental Response and Objections to Defendant's First Set of Discovery Requests to Plaintiff, served April 29, 2016.

5. Attached as Exhibit D (filed under seal) is a true and correct copy the Deposition of Virginia Giuffre taken in the above captioned matter on May 3, 2016, and designated by Plaintiff as Confidential under the Protective Order.

6. Attached as Exhibit E (filed under seal) is a true and correct copy of medical records bates labeled GIUFFRE005431-5438, produced by Plaintiff on May 12, 2016.

7. Attached as Exhibit F (filed under seal) is a true and correct copy of medical records bates labeled GIUFFRE005492-5496, produced by Plaintiff on May 25, 2016.

8. Attached as Exhibit G (filed under seal) is a true and correct copy of excerpts from the Deposition of [REDACTED] taken in the above captioned matter on May 24, 2016, and designated by Plaintiff as Confidential under the Protective Order.

9. Attached as Exhibit H (filed under seal) is a true and correct copy of medical records bates labeled GIUFFRE005498-005569, produced by Plaintiff on June 1, 2016.

10. Attached as Exhibit I (filed under seal) is a true and correct copy of excerpts from the Deposition of Dr. Steven Olsen taken in the above captioned matter on May 26, 2016, and designated by Plaintiff as Confidential under the Protective Order.

11. Attached as Exhibit K (filed under seal) is a true and correct copy of a letter from Sigrid McCawley to Laura A. Menninger enclosing documents bates labeled GIUFFRE005607-5613, produced by Plaintiff on June 10, 2016.

12. Attached as Exhibit L is a true and correct copy of a letter from Laura A. Menninger to Sigrid McCawley and Meredith Shultz dated June 13, 2016 concerning discovery.

13. Attached as Exhibit M (filed under seal) is a true and correct copy of the Errata Sheet served relating to the Deposition of Virginia Giuffre taken in the above captioned matter, served on June 1, 2016.

14. Attached as Exhibit N (filed under seal) is a true and correct copy of Plaintiff, Virginia Giuffre's Third Revised Disclosure Pursuant to Fed. R. Civ. P. 26, served June 1, 2016.

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

#### CERTIFICATE OF SERVICE

I certify that on June 20, 2016, I electronically served this *Declaration Of Laura A. Menninger In Support Of Defendant's Motion to Reopen Deposition of Plaintiff Virginia Giuffre* via ECF on the following:

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/s/ Nicole Simmons  
Nicole Simmons

## **EXHIBIT A**