

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
VIRGINIA L. GIUFFRE,  
Plaintiff,  
v.  
GHISLAINE MAXWELL,  
Defendant.  
-----X

**15-cv-07433-RWS**

**Declaration Of Laura A. Menninger In Support Of Ms. Maxwell's  
Reply In Support of Her Objection to Unsealing Sealed Materials**

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 Ms. Maxwell's Reply In Support of Her Objection to Unsealing Sealed Material.

2. Attached as Exhibit A (filed under seal) are true and correct copies of the certified mail return receipts for J. Doe 1 and J. Doe 2.

3. Attached as Exhibit B (filed under seal) are true and correct copies of excerpts from the deposition of [REDACTED], designated Confidential under the Protective Order.

4. Attached as Exhibit C (filed under seal) are true and correct copies of excerpts from the deposition of [REDACTED] designated Confidential under the Protective Order.

5. Attached as Exhibit D (filed under seal) is a true and correct copy of [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

6. Attached as Exhibit E is a true and correct copy of an Order Denying Motion to Join Under Rule 21, *Doe v. United States*, No. 08-80736-Civ-Marra/Johnson (S.D. Fla. Apr. 7, 2016).

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

Executed on July 1, 2020.

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

**CERTIFICATE OF SERVICE**

I certify that on July 1, 2020, I electronically served this *Declaration of Laura A. Menninger in Support of Ms. Maxwell's Reply In Support of Her Objection to Unsealing Sealed Material* via ECF on the following:

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/s/ Nicole Simmons  
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