

**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’s Reply in Support of Motion for Protective Order
Regarding Personal Financial Information**

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 Reply to Plaintiff’s Opposition to Defendant’s Motion To Reopen Plaintiff’s Deposition.

2. Attached as Exhibit D (filed under seal) is a true and correct copy of correspondence between Plaintiff and literary agent Marianne Strong dated February 19, 2014 and February 21, 2014, marked as Confidential by Plaintiff.

Dated: August 29, 2016

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

CERTIFICATE OF SERVICE

I certify that on August 29, 2016, I electronically served this *Declaration Of Laura A. Menninger In Support Of Reply in Support of Motion for Protective Order Regarding Personal Financial Information* via ECF on the following:

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/s/ Nicole Simmons

Nicole Simmons