

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 [REDACTED]

I, [REDACTED] declare as follows:

1. I am an attorney at law duly licensed in the State of New York.
2. I am familiar generally with the subject matter of this action, No. 15-cv-07433-RWS

(S.D.N.Y.).

3. Before, during and subsequent to April 2015, [REDACTED]

[REDACTED] As of that time, Mr. Epstein and Ghislaine Maxwell were parties to a joint defense agreement, to which [REDACTED]

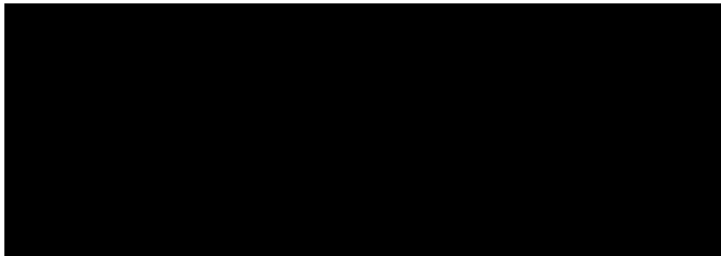
4. [REDACTED], I consider Mr. Epstein and his lawyers and Ms. Maxwell and her lawyers to have a common interest under the common interest doctrine with respect to the plaintiff Virginia Giuffre's allegations relating to their involvement in "sexual trafficking" and related matters.

5. [REDACTED] Mr. Epstein, my communication with Ms. Menninger, including email communication, has involved the exchange of information that I deem to be attorney work product because it implicates my or Ms. Menninger's or both of our

mental impressions, conclusions, opinions and/or theories concerning legal matters within the common interest agreement

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

Executed on August 19, 2016.



CERTIFICATE OF SERVICE

I certify that on August 19, 2016, I electronically served this *Declaration of* [REDACTED] via ECF on the following:

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/s/ Nicole Simmons

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