

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

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

15-cv-07433-RWS

**Declaration of Laura A. Menninger in Support of
Defendant’s Motion to Compel Non-Party Witness to Produce Documents,
Respond to Deposition Questions, and Response to Motion for Protective Order**

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 in this action. I respectfully submit this Declaration in support of Ms. Maxwell’s Motion to Compel Non-Party Witness to Produce Documents, Respond to Deposition Questions, and Response to Motion for Protective Order.

2. Attached as Exhibit A (filed under seal) are true and correct copies of excerpts from the deposition of Sarah Ransome on February 17, 2017, designated Confidential under the Protective Order.

3. Attached as Exhibit B (filed under seal) is a true and correct copy of Exhibit 11 from the deposition of Sarah Ransome on February 17, 2017, designated Confidential under the Protective Order.

4. Attached as as Exhibit C (filed under seal) is a true and correct copy of the engagement letter between Ms. Ransome and Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L., J. Stanley Pottinger PLLC, and Paul Cassell, Esq., dated November 7, 201, Bates stamped Ransome_000016.

5. Attached as Exhibit D (filed under seal) is a true and correct copy of Exhibit 5 from the deposition of Sarah Ransome on February 17, 2017, designated Confidential under the Protective Order.

6. Attached as Exhibit E (filed under seal) is a true and correct copy of Non-Party Sarah Ransome's Response and Objections to Defendant's Subpoena Request, dated February 13, 2017.

7. Attached as Exhibit F (filed under seal) is a true and correct copy of Exhibit 3 from the deposition of Sarah Ransome on February 17, 2017, designated Confidential under the Protective Order.

8. Attached as Exhibit G (filed under seal) is a true and correct copy of Exhibit 9 from the deposition of Sarah Ransome on February 17, 2017, designated Confidential under the Protective Order.

9. Attached as Exhibit H (filed under seal) is a true and correct copy of Exhibit 10 from the deposition of Sarah Ransome on February 17, 2017, designated Confidential under the Protective Order.

10. Attached as Exhibit I (filed under seal) is a true and correct copy of Exhibit 8 from the deposition of Sarah Ransome on February 17, 2017, designated Confidential under the Protective Order.

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

Executed on March 2, 2017.

s/ Laura A. Menninger

Laura A. Menninger

CERTIFICATE OF SERVICE

I certify that on March 2, 2017, I electronically served this *Declaration of Laura A. Menninger in Support of Defendant's Motion to Compel Non-Party Witness to Produce Documents, Respond to Deposition Questions, and Response to Motion for Protective Order* via ECF on the following:

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/s/ Nicole Simmons

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