

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 Appoint Special Master to Preside Over Third Deposition of Defendant**

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 Appoint Special Master to Preside Over Third Deposition of Defendant.

2. Attached as Exhibit A are true and correct copies of excerpts from the deposition of Ghislaine Maxwell on July 22, 2016, designated Confidential under the Protective Order.

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

Executed on April 11, 2017.

*s/ Laura A. Menninger*  
\_\_\_\_\_  
Laura A. Menninger

**CERTIFICATE OF SERVICE**

I certify that on April 11, 2017, I electronically served this *Declaration of Laura A. Menninger in Support of Defendant's Motion to Appoint Special Master to Preside Over Third Deposition of Defendant* via ECF on the following:

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*/s/ Nicole Simmons*

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Nicole Simmons