

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

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VIRGINIA L. GIUFFRE,

Plaintiff,

v.

15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendant.

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**Declaration Of Laura A. Menninger In Support Of Motions For
Protective Order Regarding Deposition Of Defendant And
Motion To Compel Plaintiff To Provide Rule 26(a)(1) Disclosures**

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 Motions for Protective Order Regarding Deposition of Defendant and Motion to Compel Plaintiff to Provide Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1).

2. Attached as Exhibit A is a true and correct copy of Plaintiff’s Response and Objections to Defendant’s First Set of Discovery Requests to Plaintiff, served on March 16, 2016.

3. Attached as Exhibit B is a true and correct copy of Plaintiff, Virginia L. Giuffre’s Disclosure Pursuant to Fed. R. Civ. P. 26, served on November 11, 2015.

4. Attached as Exhibit C is a true and correct copy of Plaintiff, Virginia Giuffre's Revised Disclosure Pursuant to Fed. R. Civ. P. 26, served on March 11, 2016.

5. Attached as Exhibit D is a true and correct copy of correspondence from Menninger to McCawley on February 20, 2016, concerning interrogatory responses.

6. Attached as Exhibit E is a true and correct copy of correspondence from Menninger to McCawley on February 20, 2016, concerning scheduling of Ms. Maxwell's deposition.

7. Attached as Exhibit F is a true and correct copy of correspondence from Menninger to McCawley on February 24, 2016, concerning Plaintiff's deficient Rule 26 disclosures.

8. Attached as Exhibit G is a true and correct copy of correspondence from McCawley to Menninger on March 7, 2016, stating her intent to supplement disclosures shortly.

9. Attached as Exhibit H, is a true and correct copy of correspondence from Menninger to McCawley on March 8, 2016.

10. Attached as Exhibit I is a true and correct copy of correspondence from Menninger to McCawley on March 10, 2016, concerning defendant's request to postpone the deposition due to Plaintiff's untimely discovery responses.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 22, 2016 in Denver, Colorado.

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