

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

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

15-cv-07433-RWS

**Declaration Of Laura A. Menninger In Support Of Defendant's 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 Defendant's Motion for Protective Order Regarding Personal Financial Information.

2. Attached as Exhibit A is a true and correct copy of Request for Production Numbered 21-43 from Plaintiff's Second Request for Production of Documents to Defendant Ghislaine Maxwell dated April 14, 2016.

3. Attached as Exhibit B is a true and correct copy of Defendant Ghislaine Maxwell's Responses and Objections to Requests Numbered 21-43 from Plaintiff's Second Request for Production of Documents dated May 16, 2016.

4. Attached as Exhibit C (filed under seal) is a true and correct copy of an email correspondence dated January 2, 2015 and Bates numbered [REDACTED]

Dated: August 12, 2016

By: /s/ Laura A. Menninger

Laura A. Menninger

CERTIFICATE OF SERVICE

I certify that on August 12, 2016, I electronically served this *Declaration Of Laura A. Menninger In Support Of Defendant's Motion for Protective Order Regarding Personal Financial Information* via ECF on the following:

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/s/ Brenda Rodriguez