UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

X	
VIRGINIA L. GIUFFRE,	
Plaintiff, v.	15-cv-07433-RWS
GHISLAINE MAXWELL,	
Defendant.	
X	

Declaration Of Laura A. Menninger In Support Of Motion To Compel All Attorney-Client Communications and Attorney Work Product Placed At Issue by Plaintiff and Her Attorneys

- 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 to Compel All Attorney-Client Communications and Attornty Work Product Placed At Issue by Plaintiff and Her Attorney.
- 2. Attached as Exhibit A is a true and correct copy of excerpts categorically logged entries from Plaintiff Giuffre's Revised Supplemental Privilege Log dated April 29, 2016.
- 3. Attached as Exhibit B is a true and correct copy of Plaintiff Giuffre's Discovery Second Amended Supplemental Response to Interrogatory No. 3 concerning her attorney representations, dated April 29, 2016.

4.	Attached as Exhibit C (filed under seal)
5.	Attached as Exhibit D is a true and correct copy of the Order in the CVRA Case
dated April 6	5, 2015.
6.	Attached as Exhibit E is a true and correct copy of the Motion for Summary
Judgment in	the Edwards and Cassell v. Dershowitz, Case No. 15-00072, In and for the
Seventeenth	Judicial District, Broward County, Florida ("Dershowitz Case") dated November
25, 2015.	
7.	Attached as Exhibit F is a true and correct copy of the Complaint in the
Dershowitz (Case dated January 6, 2015.
8.	Attached as Exhibit G is a true and correct copy of the Notice of Serving Answers
to Interrogate	ories in Dershowitz Case dated March 13, 2015.
9.	Attached as Exhibit H (filed under seal)
10.	Attached as Exhibit I is a true and correct copy of the Declaration of Virginia
Giuffre in th	e Dershowitz Case dated November 20, 2015

Attached as Exhibit J (filed under seal)

11.

12. Attached as Exhibit K (filed under seal)

13. Attached as Exhibit L is a true and correct copy of the October 16, 2015

Deposition of Paul G. Cassell taken in the Edwards and Cassell v. Dershowitz, In and for the

Seventeenth Judicial District, Broward County, Florida matter.

14. Attached as Exhibit M is a true and correct copy of the press release issued by the

parties in the Dershowitz Case on April 8, 2016.

15. Attached as Exhibit N is a true and correct copy of the interview of Virginia

Roberts by Edwards and Scarola in the Epstein v. Rothstein, Edwards, and L.M, In and for the

Fifteenth Judicial District, Palm Beach County, Florida ("Epstein Case").

16. Attached as Exhibit O is a true and correct copy of the May 17, 2011 Notice of

Filing of the interview in the Epstein Case.

17. Attached as Exhibit P is a true and correct copy of a portion of the ECF Docket

Sheet in the CVRA Case.

18. Attached as Exhibit Q is a true and correct copy of the document produced by

Plaintiff in this matter as GIUFFRE000862-000887.

By: /s/ Laura A. Menninger

Laura A. Menninger

CERTIFICATE OF SERVICE

I certify that on May 26, 2016, I electronically served this *Declaration Of Laura A*. *Menninger In Support Of Motion To Compel All Attorney-Client Communications and Attornty Work Product Placed At Issue by Plaintiff and her Attorney* via ECF on the following:

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/s/ Nicole Simmons

Nicole Simmons