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
Reply to Plaintiff's Opposition to Defendant's Motion To Reopen
<u>Plaintiff's Deposition</u>

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 Reply to Plaintiff's Opposition to Defendant's Motion To Reopen Plaintiff's Deposition.

2.   Attached as Exhibit O (filed under seal) are true and correct copies of select pages of Plaintiff's medical records bates labeled GIUFFRE 5089, 5316-18, 6631, designated as Confidential under the Protective Order.

3.   Attached as Exhibit P (filed under seal) are true and correct copies of excerpts from the deposition of Anthony Figuera, designated as Confidential under the Protective Order.

Dated: July 8, 2016

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

CERTIFICATE OF SERVICE

I certify that on July 8, 2016, I electronically served this *Declaration Of Laura A.*

Menninger In Support Of Reply to Plaintiff's Opposition to Defendant's Motion To Reopen

Plaintiff's Deposition via ECF on the following:

Sigrid S. McCawley
Meredith Schultz
BOIES, SCHILLER & FLEXNER, LLP
401 East Las Olas Boulevard, Ste. 1200
Ft. Lauderdale, FL 33301
smccawley@bsfllp.com
mschultz@bsfllp.com

Bradley J. Edwards
FARMER, JAFFE, WEISSING, EDWARDS,
FISTOS & LEHRMAN, P.L.
425 North Andrews Ave., Ste. 2
Ft. Lauderdale, FL 33301
brad@pathtojustice.com

Paul G. Cassell
383 S. University Street
Salt Lake City, UT 84112
cassellp@law.utah.edu

J. Stanley Pottinger
49 Twin Lakes Rd.
South Salem, NY 10590
StanPottinger@aol.com

/s/ Nicole Simmons
Nicole Simmons

2