

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
Defendant’s Reply in Support of Motion for Summary Judgment**

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 Reply in Support of Motion for Summary Judgment.¹

2. In Defendant’s Memorandum of Law in Support of Motion for Summary Judgment (filed Jan. 9, 2017), I included numbered paragraphs corresponding to undisputed facts from the movant’s perspective as contemplated by Local Civil Rule 56.1(a), together with the citation to admissible evidence as required by Fed. R. Civ. P. 56(c). *See* Doc. 541, *passim*.

¹At trial, defendant intends to produce either the custodian of record relevant to any disputed document or a certification in compliance with either Fed. R. Evid. P. 803 and/or 902. *See* Fed. R. Civ. P. 56(c). Apart from deposition testimony, the majority of non-deposition documents herein were either produced by plaintiff or obtained with releases signed by plaintiff.

3. On January 9, 2017, I also prepared and served on the Court and counsel, under seal, Defendant's Statement of Material Undisputed Facts Pursuant to Local Civil Rule 56.1 ("Statement"). Those paragraphs mirror the numbered paragraphs contained within the Memorandum of Law, minus the citations to the evidentiary record. The Statement was filed with the Court in hard-copy and placed in the vault (*see* Doc.543).

4. Through a clerical oversight, a redacted version of the Statement was not appended to the filed ECF version of the Notice of Motion for Summary Judgment (Doc. 537). However, as noted in the previous two paragraphs, Ms. Maxwell enumerated all undisputed facts in accordance with Local Civil Rule 56.1(a) in:

- Ms. Maxwell's Memorandum of Law in Support of Motion for Summary Judgment (Doc.541); and
- the Local Rule 56.1 Statement served on the the Court and counsel and filed in hard copy with the Court.

5. Attached as Exhibit NN (filed under seal) is a true and correct copy of Defendant, Ghislaine Maxwell's Initial Disclosure Pursuant to Fed. R. Civ. P. 26, served February 24, 2016.

6. Attached as Exhibit OO (filed under seal) is a true and correct copy of an email correspondence from Plaintiff to Sharon Churcher, dated May 12, 2011, Bates stamped GIUFFRE004096-7; 004028-30.

7. Attached as Exhibit PP (filed under seal) are true and correct copies of excerpts from the November 14, 2016 deposition of Virginia Giuffre, designated Confidential under the Protective Order.

8. Attached as Exhibit QQ (filed under seal) is a true and correct copy of an email correspondence from Plaintiff to Sharon Churcher, dated May 12, 2011, Bates stamped GIUFFRE003959.

9. Attached as Exhibits RR (filed under seal) are true and correct copies of excerpts from the May 3, 2016 deposition of Virginia Giuffre, designated Confidential under the Protective Order.

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

Executed on February 10, 2017.

s/ Laura A. Menninger

Laura A. Menninger

CERTIFICATE OF SERVICE

I certify that on February 10, 2017, I electronically served this *Declaration of Laura A. Menninger in Support of Defendant's Reply to Her Motion for Summary Judgment* via ECF on the following:

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/s/ Nicole Simmons

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