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 Defendant's Response in Opposition to Motion To Exceed <u>Presumptive Ten Deposition Limit</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 Ms. Maxwell's Response in Opposition to Motion To Exceed Presumptive Ten Deposition Limit.
- Attached as Exhibit A (filed under seal) is a true and correct copy of excerpts
 from the Deposition of Virginia Giuffre taken in the above captioned matter on May 3, 2016, and
 designated by Plaitniff as Confidential under the Protective Order.

By: /s/ Laura A. Menninger

Laura A. Menninger

CERTIFICATE OF SERVICE

I certify that on June 6, 2016, I electronically served this *Declaration Of Laura A*. *Menninger In Support Of Response in Opposition to Motion To Exceed Presumptive Ten Deposition Limit* via ECF on the following:

Sigrid S. McCawley
Meridith 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