

**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 to Exclude Evidence Pursuant to Fed. R. Evid. 404(B)**

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 Motion to Exclude Evidence Pursuant to Fed. R. Evid. 404(b).

2. Attached as Exhibit A (filed under seal) are true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

3. Attached as Exhibit B (filed under seal) are true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

4. Attached as Exhibit C (filed under seal) is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

5. Attached as Exhibit D (filed under seal) is a true and correct copy of the [REDACTED]

[REDACTED]

[REDACTED]

6. Attached as Exhibit E (filed under seal) is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

7. Attached as Exhibit F (filed under seal) are true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

8. Attached as Exhibit G (filed under seal) is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

9. Attached as Exhibit H (filed under seal) are true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

10. Attached as Exhibit I (filed under seal) is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

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

Executed on March 3, 2017.

*s/ Laura A. Menninger*

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Laura A. Menninger

## CERTIFICATE OF SERVICE

I certify that on March 3, 2017, I electronically served this *Declaration of Laura A. Menninger in Support of Defendant's Motion to Exclude Evidence Pursuant to Fed. R. Evid. 404(b)* via ECF on the following:

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/s/ Nicole Simmons

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