

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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VIRGINIA L. GIUFFRE,  
Plaintiff,  
v.  
GHISLAINE MAXWELL,  
Defendant.  
-----X

**15-cv-07433-RWS**

**Declaration of Laura A. Menninger in Support of  
Defendant's Renewed Motion to Compel Settlement Agreement**

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 Renewed Motion to Compel Settlement Agreement.

2. Attached as Exhibit A (filed under seal) is a true and correct copy of Plaintiff's Response And Objections To Defendant's First Set Of Discovery Requests To Plaintiff, served March 16, 2016.

3. Attached as Exhibit B (filed under seal) are true and correct copies of conferral communication between counsel, including a true and correct copy of Jeffrey Epstein's written

waiver of claims concerning settlement agreement's confidentiality provision dated August 16, 2016.

4. Attached as Exhibit C (filed under seal) is a true and correct copy of the Complaint in *Jane Doe 102 v. Jeffery Epstein*, Case 9:09- cv-80656- KAM, filed in the United States District Court for the Southern District of Florida, on May 4, 2009.

5. Attached as Exhibit D (filed under seal) is true and correct copy of Plaintiff's Fourth Revised Rule 26(a) Disclosures served on June 24, 2016.

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

Executed on September 6, 2016.

s/ Laura A. Menninger  
Laura A. Menninger

#### **CERTIFICATE OF SERVICE**

I certify that on September 6, 2016, I electronically served this *Declaration of Laura A. Menninger in Support of Defendant's Renewed Motion to Compel Settlement Agreement* via ECF on the following:

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*/s/ Nicole Simmons*  
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