

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 Opposition to  
Renewed Pro Hac Vice Motions of Messrs. Cassell and Edwards**

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 Defendant’s Opposition to Plaintiff’s Motion for Forensic Examination.
2. Attached as Exhibit A are true and correct copies of correspondence between counsel for Ms. Maxwell and counsel for Ms. Giuffre on April 21, 2016.
3. Attached as Exhibit B is a true and correct copy of “Plaintiffs and Non-Party Virginia Giuffre’s Notice Regarding the Parties Joint Stipulation of Dismissal,” filed on April 11, 2016, in *Cassell and Edwards v. Dershowitz*, In and for the Seventeenth Judicial District, Broward County, Florida.

By: */s/ Laura A. Menninger*

\_\_\_\_\_  
Laura A. Menninger

**CERTIFICATE OF SERVICE**

I certify that on April 21, 2016, I electronically served this Declaration Of Laura A. Menninger In Opposition to Renewed Pro Hac Vice Motions of Messrs. Cassell anEdward via ECF on the following:

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

*/s/ Laura A Menninger*

\_\_\_\_\_  
Laura A. Menninger

**Subject:** Giuffre v Maxwell -[Supplemental Materials]

**Date:** Thursday, April 21, 2016 at 5:44:02 PM Eastern Daylight Time

**From:** Laura Menninger

**To:** Sigrid S. McCawley

**CC:** Jeff Pagliuca

Sigrid

We did not receive any supplemental materials in support of Mr Cassell's pro hac application.

If materials were submitted to the Court, please provide them to us immediately.

-Laura

Thursday, April 21, 2016 at 11:22:05 PM Eastern Daylight Time

**Subject:** RE: Giuffre v Maxwell -[Supplemental Materials]  
**Date:** Thursday, April 21, 2016 at 5:44:56 PM Eastern Daylight Time  
**From:** Sigrid McCawley  
**To:** Laura Menninger  
**CC:** Jeff Pagliuca

My staff is scanning them to you now. You should have them momentarily.

Sigrid S. McCawley  
Partner  
BOIES, SCHILLER & FLEXNER LLP  
401 East Las Olas Blvd., Suite 1200  
Fort Lauderdale, FL 33301  
Phone: 954-356-0011 ext. 4223  
Fax: 954-356-0022  
<http://www.bsflp.com>

-----Original Message-----

**From:** Laura Menninger [<mailto:lmenninger@hmflaw.com>]  
**Sent:** Thursday, April 21, 2016 5:44 PM  
**To:** Sigrid McCawley  
**Cc:** Jeff Pagliuca  
**Subject:** Giuffre v Maxwell -[Supplemental Materials]

Sigrid

We did not receive any supplemental materials in support of Mr Cassell's pro hac application.

If materials were submitted to the Court, please provide them to us immediately.

-Laura

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**Subject:** Re: Giuffre v Maxwell -[Supplemental Materials]  
**Date:** Thursday, April 21, 2016 at 5:48:25 PM Eastern Daylight Time  
**From:** Laura Menninger  
**To:** Sigrid McCawley  
**CC:** Jeff Pagliuca

How and when were they provided to the Court?

On Apr 21, 2016, at 5:45 PM, Sigrid McCawley <[Smccawley@BSFLLP.com](mailto:Smccawley@BSFLLP.com)> wrote:

My staff is scanning them to you now. You should have them momentarily.

Sigrid S. McCawley

Partner

BOIES, SCHILLER & FLEXNER LLP

401 East Las Olas Blvd., Suite 1200

Fort Lauderdale, FL 33301

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Fax: 954-356-0022

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-----Original Message-----

From: Laura Menninger [<mailto:lmenninger@hmflaw.com>]

Sent: Thursday, April 21, 2016 5:44 PM

To: Sigrid McCawley

Cc: Jeff Pagliuca

Subject: Giuffre v Maxwell -[Supplemental Materials]

Sigrid

We did not receive any supplemental materials in support of Mr Cassell's pro hac application.

If materials were submitted to the Court, please provide them to us immediately.

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[v.1]

**Subject:** Supplemental Materials

**Date:** Thursday, April 21, 2016 at 5:49:24 PM Eastern Daylight Time

**From:** Meredith Schultz

**To:** Laura Menninger, Jeff Pagliuca

**CC:** Sigrid McCawley

Laura/Jeff,

Please see the attached.

Thanks,

Meredith

---

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**Subject:** Re: Supplemental Materials

**Date:** Thursday, April 21, 2016 at 5:52:27 PM Eastern Daylight Time

**From:** Jeff Pagliuca

**To:** Meredith Schultz

**CC:** Laura Menninger, Sigrid McCawley

I would like to know when these were filed with the court.

Jeff

On Apr 21, 2016, at 5:49 PM, Meredith Schultz <[mschultz@BSFLLP.com](mailto:mschultz@BSFLLP.com)> wrote:

Laura/Jeff,

Please see the attached.

Thanks,

Meredith

---

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<Pages from GM Scanned fax.pdf>

Thursday, April 21, 2016 at 11:22:05 PM Eastern Daylight Time

**Subject:** RE: Giuffre v Maxwell -[Supplemental Materials]  
**Date:** Thursday, April 21, 2016 at 6:02:10 PM Eastern Daylight Time  
**From:** Sigrid McCawley  
**To:** Laura Menninger  
**CC:** Jeff Pagliuca

I am in the NY office and we gave it to staff for faxing and then scanning. I believe it was about an hour ago. I just got the scanned copy and sent it to you. We are also planning to file similar papers on behalf of Brad Edwards which we will be sending shortly but it is not complete.

**Sigrid S. McCawley**

Partner

**BOIES, SCHILLER & FLEXNER LLP**

401 East Las Olas Blvd., Suite 1200

Fort Lauderdale, FL 33301

Phone: 954-356-0011 ext. 4223

Fax: 954-356-0022

<http://www.bsflp.com>

---

**From:** Laura Menninger [mailto:lmenninger@hmflaw.com]  
**Sent:** Thursday, April 21, 2016 5:48 PM  
**To:** Sigrid McCawley  
**Cc:** Jeff Pagliuca  
**Subject:** Re: Giuffre v Maxwell -[Supplemental Materials]

How and when were they provided to the Court?

> On Apr 21, 2016, at 5:45 PM, Sigrid McCawley <[Smccawley@BSFLLP.com](mailto:Smccawley@BSFLLP.com)> wrote:

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> My staff is scanning them to you now. You should have them momentarily.

>

> Sigrid S. McCawley

> Partner

> BOIES, SCHILLER & FLEXNER LLP

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> <http://www.bsflp.com>

>

> -----Original Message-----

> From: Laura Menninger [mailto:lmenninger@hmflaw.com]

> Sent: Thursday, April 21, 2016 5:44 PM

> To: Sigrid McCawley

> Cc: Jeff Pagliuca

> Subject: Giuffre v Maxwell -[Supplemental Materials]

>

> Sigrid

>

> We did not receive any supplemental materials in support of Mr Cassell's pro hac application.

>

> If materials were submitted to the Court, please provide them to us immediately.

>

> -Laura

>

>

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**Subject:** Re: Giuffre v Maxwell -[Supplemental Materials]  
**Date:** Thursday, April 21, 2016 at 6:57:29 PM Eastern Daylight Time  
**From:** Jeff Pagliuca  
**To:** Sigrid McCawley  
**CC:** Laura Menninger

I am assuming you have a time stamp on your fax. It was not part of what you sent to me. Please give me an exact time stamp on the filing.

Jeff

On Apr 21, 2016, at 6:02 PM, Sigrid McCawley <[Smccawley@BSFLLP.com](mailto:Smccawley@BSFLLP.com)> wrote:

I am in the NY office and we gave it to staff for faxing and then scanning. I believe it was about an hour ago. I just got the scanned copy and sent it to you. We are also planning to file similar papers on behalf of Brad Edwards which we will be sending shortly but it is not complete.

**Sigrid S. McCawley**

Partner

**BOIES, SCHILLER & FLEXNER LLP**

401 East Las Olas Blvd., Suite 1200

Fort Lauderdale, FL 33301

Phone: 954-356-0011 ext. 4223

Fax: 954-356-0022

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---

**From:** Laura Menninger [<mailto:lmenninger@hmflaw.com>]  
**Sent:** Thursday, April 21, 2016 5:48 PM  
**To:** Sigrid McCawley  
**Cc:** Jeff Pagliuca  
**Subject:** Re: Giuffre v Maxwell -[Supplemental Materials]

How and when were they provided to the Court?

> On Apr 21, 2016, at 5:45 PM, Sigrid McCawley <[Smccawley@BSFLLP.com](mailto:Smccawley@BSFLLP.com)> wrote:  
>  
> My staff is scanning them to you now. You should have them momentarily.  
>  
> Sigrid S. McCawley  
> Partner  
> BOIES, SCHILLER & FLEXNER LLP  
> 401 East Las Olas Blvd., Suite 1200  
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> -----Original Message-----  
> From: Laura Menninger [<mailto:lmessenger@hmflaw.com>]  
> Sent: Thursday, April 21, 2016 5:44 PM  
> To: Sigrid McCawley  
> Cc: Jeff Pagliuca  
> Subject: Giuffre v Maxwell -[Supplemental Materials]  
>  
> Sigrid  
>  
> We did not receive any supplemental materials in support of Mr Cassell's pro hac  
application.  
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> If materials were submitted to the Court, please provide them to us immediately.  
>  
> -Laura  
>  
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**Subject:** Re: Giuffre v Maxwell -[Supplemental Materials]  
**Date:** Thursday, April 21, 2016 at 8:17:47 PM Eastern Daylight Time  
**From:** Jeff Pagliuca  
**To:** Sigrid McCawley  
**CC:** Laura Menninger

I have not received a response to this request. "I believe it was about an hour ago" is not an acceptable response. Given that the court converted this issue into a motion hearing it was inappropriate for you to respond by letter and fax to the judge. I assume it is because you did not want the adverse party in the Dershowitz matter to have these statements available for review.

Again, please provide me with a fax confirmation sheet that discloses when this communication was sent to Judge Sweet.

Jeff

On Apr 21, 2016, at 6:57 PM, Jeff Pagliuca <[jpagliuca@hmflaw.com](mailto:jpagliuca@hmflaw.com)> wrote:

I am assuming you have a time stamp on your fax. It was not part of what you sent to me. Please give me an exact time stamp on the filing.

Jeff

On Apr 21, 2016, at 6:02 PM, Sigrid McCawley <[Smccawley@BSFLLP.com](mailto:Smccawley@BSFLLP.com)> wrote:

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**Sigrid S. McCawley**

Partner

**BOIES, SCHILLER & FLEXNER LLP**

401 East Las Olas Blvd., Suite 1200

Fort Lauderdale, FL 33301

Phone: 954-356-0011 ext. 4223

Fax: 954-356-0022

<http://www.bsflp.com>

---

**From:** Laura Menninger [<mailto:lmenninger@hmflaw.com>]  
**Sent:** Thursday, April 21, 2016 5:48 PM  
**To:** Sigrid McCawley  
**Cc:** Jeff Pagliuca  
**Subject:** Re: Giuffre v Maxwell -[Supplemental Materials]

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> On Apr 21, 2016, at 5:45 PM, Sigrid McCawley  
<[Smccawley@BSFLLP.com](mailto:Smccawley@BSFLLP.com)> wrote:

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> Sigrid S. McCawley  
> Partner  
> BOIES, SCHILLER & FLEXNER LLP  
> 401 East Las Olas Blvd., Suite 1200  
> Fort Lauderdale, FL 33301  
> Phone: 954-356-0011 ext. 4223  
> Fax: 954-356-0022  
> <http://www.bsflp.com>

>  
> -----Original Message-----  
> From: Laura Menninger [<mailto:lmenninger@hmflaw.com>]  
> Sent: Thursday, April 21, 2016 5:44 PM  
> To: Sigrid McCawley  
> Cc: Jeff Pagliuca  
> Subject: Giuffre v Maxwell -[Supplemental Materials]

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> Sigrid  
>  
> We did not receive any supplemental materials in support of Mr Cassell's  
pro hac application.

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immediately.

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> -Laura

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>

Thursday, April 21, 2016 at 11:22:05 PM Eastern Daylight Time

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**Subject:** FW: fax transmittal

**Date:** Thursday, April 21, 2016 at 8:39:56 PM Eastern Daylight Time

**From:** Jeff Pagliuca

**To:** Laura Menninger

---

**From:** Meredith Schultz <[mschultz@BSFLLP.com](mailto:mschultz@BSFLLP.com)>

**Date:** Thursday, April 21, 2016 at 6:07 PM

**To:** Jeffrey Pagliuca <[jpagliuca@hmflaw.com](mailto:jpagliuca@hmflaw.com)>

**Cc:** Sigrid McCawley <[Smccawley@BSFLLP.com](mailto:Smccawley@BSFLLP.com)>

**Subject:** fax transmittal

Jeff,

We sent the fax to the Court at approximately 4:30. We were going to serve it to you at that time, but it did not get out until later due to a clerical error. You have my apologies for that – it was not intentional.

My fax transmittal sheet is in error, and says that the fax was sent at 3:31. Again, this is in error. All of the fax machines in my firm's New York office are off by approximately 1 hour. It appears that all the fax machines were not set reset last month with the "spring forward" time change. Judge Sweet's fax receipt (if set correctly) should say the exact time it was received, and it should reflect that it was transmitted around 4:30 instead of around 3:30.

I looked at three fax machines in the office from which the fax could have been sent. At present, I don't know what machine it was sent from. However, the time displayed by all three fax machines are off by about an hour, but all differ a few minutes in what time they read. Because of the discrepancies among the machines, and because we don't know at present which fax machine it was sent from, I cannot give you a precise time of transmittal at the time. However, all three machines read approximately one hour earlier than it actually is.

The staff has been made aware of this issue (as you can see from the attached). Also, earlier, we took a picture of one of the fax machines with a time-stamp of the photograph, showing the discrepancy – that picture is also attached.

Thanks,

Meredith

Meredith L. Schultz  
BOIES, SCHILLER & FLEXNER LLP  
401 East Las Olas Blvd., Suite 1200  
Fort Lauderdale, FL 33301

Phone: 954-356-0011 ext. 4204

Fax: 954-356-0022

<http://www.bsflp.com>

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IN THE CIRCUIT COURT OF THE 17th  
JUDICIAL CIRCUIT IN AND FOR  
BROWARD COUNTY, FLORIDA

CIVIL DIVISION

BRADLEY J. EDWARDS, and  
PAUL G. CASSELL,

CASE NO. CACE 15-000072

Plaintiffs,

v.

ALAN DERSHOWITZ,

Defendant.

**PLAINTIFFS AND NON-PARTY VIRGINIA GIUFFRE'S NOTICE REGARDING THE  
PARTIES' JOINT STIPULATION OF DISMISSAL**

Plaintiffs and Non-Party Virginia Giuffre, by and through undersigned counsel, hereby provide the Court with Notice that while the Plaintiff and Defendant submitted a Joint Stipulation of Dismissal, on April 8, 2016, there remain issues pending before the Court that requires the Court to retain jurisdiction over this matter. Specifically, the Court has specially set for hearing on May 12, 2016, non-party Virginia Giuffre's Supplemental Motion to Strike and for Sanctions against Defendant Dershowitz. *See* Exhibit A. The parties agreed that the settlement between the Plaintiffs and the Defendant would in no way affect the right of non-party Virginia Giuffre to have her pending Motion to Strike and for Sanctions heard by the Court. Accordingly, in an abundance of caution, Plaintiffs and Non-Party Giuffre provide this Notice to ensure the Court retains jurisdiction over the matter to resolve the remaining pending issues.

Dated: April 11, 2016

Respectfully submitted,

**BOIES, SCHILLER & FLEXNER LLP**

By: /s/Sigrid S. McCawley

Sigrid S. McCawley, Esq.  
Florida Bar No. 129305  
401 East Las Olas Boulevard, Suite 1200  
Fort Lauderdale, Florida 33301  
Telephone: (954) 356-0011  
Facsimile: (954) 356-0022

*Attorney for Non-Party Virginia Giuffre*

By: /s/ Jack Scarola

Jack Scarola, Esq.  
SEARCY DENNEY SCAROLA BARNHART  
& SHIPLEY, P.A.  
[JSX@searcylaw.com](mailto:JSX@searcylaw.com)  
2139 Palm Beach Lakes Blvd.  
West Palm Beach, FL 33409-6601

*Attorney for Plaintiffs*

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on April 11, 2016, a true and correct copy of the foregoing was served by Electronic Mail to the individuals identified below.

By: /s/Sigrid S. McCawley  
 Sigrid S. McCawley

<p>Thomas E. Scott  <a href="mailto:Thomas.scott@csklegal.com">Thomas.scott@csklegal.com</a>                  Steven R. Safra  <a href="mailto:Steven.safra@csklegal.com">Steven.safra@csklegal.com</a>                  COLE, SCOTT &amp; KISSANE, P.A.                  9150 S. Dadeland Blvd., Suite 1400                  Miami, Florida 33156  <a href="mailto:Renee.nail@csklegal.com">Renee.nail@csklegal.com</a>  <a href="mailto:Shelly.zambo@csklegal.com">Shelly.zambo@csklegal.com</a>    <i>Counsel for Alan Dershowitz</i></p>	<p>Richard A. Simpson  <a href="mailto:rsimpson@wileyrein.com">rsimpson@wileyrein.com</a>                  Mary E. Borja  <a href="mailto:mborja@wileyrein.com">mborja@wileyrein.com</a>                  Ashley E. Eiler  <a href="mailto:aeiler@wileyrein.com">aeiler@wileyrein.com</a>                  WILEY REIN, LLP                  1776 K Street NW                  Washington, D.C. 20006    <i>Counsel for Alan Dershowitz</i></p>
<p>Charles H. Lichtman, Esq.                  BERGER SINGERMAN LLP                  350 E. Las Olas Blvd.                  Suite 1000                  Fort Lauderdale, FL 33301                  Tel: (954) 525-9900                  Fax: (954) 523-2872                  Email: <a href="mailto:clightman@bergersingerman.com">clightman@bergersingerman.com</a>    <i>Counsel for Alan Dershowitz</i></p>	<p>Bruce S. Rogow, Esq.                  BRUCE S. ROGOW, P.A.                  100 NE 3<sup>rd</sup> Avenue, Suite 1000                  Fort Lauderdale, FL 33301                  Tel: (954) 767-8909                  Fax: (954) 764-1530                  Email: <a href="mailto:brogow@rogolaw.com">brogow@rogolaw.com</a></p>
<p>Kenneth A. Sweder, Esq.                  SWEDER &amp; ROSS, LLP                  131 Oliver Street                  Boston, MA 02110                  Tel: (617) 646-4466                  Email: <a href="mailto:ksweder@sweder-ross.com">ksweder@sweder-ross.com</a>    <i>Counsel for Alan Dershowitz</i></p>	

# EXHIBIT A

IN THE CIRCUIT COURT OF THE  
17<sup>TH</sup> JUDICIAL CIRCUIT IN AND FOR  
BROWARD COUNTY, FLORIDA

CIVIL DIVISION

CASE NO. CACE 15-000072

BRADLEY J. EDWARDS, and  
PAUL G. CASSELL,

Plaintiffs,

v.

ALAN DERSHOWITZ,

Defendant.

**AMENDED RE-NOTICE OF SPECIAL SET HEARING**

**(1 hour)**

YOU ARE HEREBY NOTIFIED that the following hearing is being rescheduled before the **Honorable Thomas Lynch, IV**, Circuit Court Judge, Seventeenth Judicial Circuit Court, Broward County Courthouse, 201 S.E. 6<sup>th</sup> Street, Room 950, Fort Lauderdale, Florida 33301, to Thursday, May 12, 2016 beginning at 1:30 p.m., and will address the following matters:

- 1) **Non-Party Virginia Roberts' Motion to Strike And For Sanctions;**
- 2) **Non-Party Virginia Giuffre's Supplemental Motion to Strike and For Sanctions**
- 3) **Defendant Alan Dershowitz's Motion in Limine to Overrule Objections**
- 4) **Defendant Alan Dershowitz's Motion to Strike Motion of Non-Party Virginia Roberts' Motion for Sanctions**

**NOTICE TO DISABLED PERSONS**

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact the Seventeenth Judicial Circuit's ADA Coordinator at 201 S.E. Sixth Street, Fort Lauderdale, FL 33301, telephone number (954) 831-7721, within two (2) working days of receipt of this document. TDD users may also call 1-800-955-8771 for the Florida Relay Service.

Dated: March 30, 2016

Respectfully submitted,

**BOIES, SCHILLER & FLEXNER LLP**  
Sigrid S. McCawley, Esq.  
[smccawley@bsfllp.com](mailto:smccawley@bsfllp.com)  
Florida Bar No. 129305  
401 East Las Olas Boulevard, Suite 1200  
Fort Lauderdale, Florida 33301  
Telephone: (954) 356-0011  
Facsimile: (954) 356-0022  
[ftleserve@bsfllp.com](mailto:ftleserve@bsfllp.com)

By: /s/ Sigrid S. McCawley  
Sigrid S. McCawley, Esq.

*Attorney for Non-Party Virginia Giuffre*

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing was served by Electronic Mail on March 30, 2016 to the individuals identified on the attached Service List.

By: /s/ Sigrid S. McCawley  
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