

# **EXHIBIT 1**

## Meredith Schultz

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**From:** Laura Menninger <lmenninger@hmflaw.com>  
**Sent:** Monday, April 11, 2016 3:32 PM  
**To:** Sigrid McCawley; Meredith Schultz  
**Cc:** Jeff Pagliuca  
**Subject:** Summary of conferral

Sigrid:

Just to confirm the results of today's conferral call:

- We will not produce to you the documents marked "Confidential" until we receive clarification from the Court regarding our dispute as to the meaning of the Protective Order's phrase "attorney actively working on this case," since you have expressed an intent to share those documents with attorneys who have not entered their appearance on this case, who are not your employees or agents, who are participating in a "joint defense agreement" with you, who are actively working on other matters for Plaintiff such as her media interests, and those other attorneys include, *inter alia*, best-selling author Stan Pottinger.
- We will provide to you in advance of your client's deposition on May 3, 2016, all documents that we intend to use at that deposition.
- We do not believe we have an obligation to describe for your our document search methods. You certainly have not provided one to us, and as your recent Reply demonstrated, whatever methods you are using has failed to capture, for example, attachments to responsive emails.

Best regards,  
Laura



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