# **EXHIBIT A**

## Case 1:15-cv-07433-LAP Document 156-1 Filed 05/20/16 Page 2 of 26

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
						AC Privilege and			
						Work			
					Funcil above with Civiffue Edwards and Cossell as attangen	Product/joint			
1	2/12/2015 6:14	Vincinia Civiffua	ana aga walaw Qhafilin ag m		Email chain with Giuffre, Edwards and Cassell re attorney	defense/commo	Withheld	2	ma a #
1	2/12/2015 6:14	Virginia Giuffre	smccawley@bsfllp.com		impressions and legal advice relating to deposition testimony	n interest AC Privilege and	withheid	3	msg
						Work			
			Smccawley@BSFLLP.com,bra			Product/joint			
			d@pathtojustice.com,robiej			defense/commo			
2	2/16/2015 1:05	StanPottinger@aol.com	ennag@y7mail.com		Discussion of evidence among client and attorneys	n interest	Withheld	2	msg
						A11			
						Attorney			
						Client/joint defense/commo			
					Email chain with Giuffre, McCawley, Pottinger and Edwards re	n interest/work			
2	2/16/2015 15:37	Virginia Giuffre	Smccawley@BSFLLP.com		information provided by client to assist in legal advice	product	Withheld	2	mca
3	2/10/2015 15.57	Virginia Giunre	Siliccawiey@bSFLLP.com		Information provided by client to assist in legal advice	product	withheid	2	msg
						Attorney			
						Client/joint			
						defense/commo			
					Email chain with Giuffre, McCawley, Pottinger and Edwards re	n interest/work			
4	2/16/2015 16:15	Sigrid McCawley	robiejennag@y7mail.com		information provided by client to assist in legal advice	product	Withheld	2	msg
						Attorney			
						Client/joint			
						defense/commo			
					Email chain with Giuffre, McCawley, Pottinger and Edwards re	n interest/work			
5	2/16/2015 16:24	Virginia Giuffre	Smccawley@BSFLLP.com		information provided by client to assist in legal advice	product	Withheld	2	msg
	2, 10, 2013 10.24	VII BITTILO GIGITIC	Sinceawicy@BSi EEi .com		information provided by client to assist in legal duvice	product	vvicinicia		11136
						Attorney			
						Client/joint			
						defense/commo			
					Email chain with Giuffre, McCawley, Pottinger and Edwards re	n interest/work			
6	2/16/2015 16:24	Sigrid McCawley	robiejennag@y7mail.com		information provided by client to assist in legal advice	product	Withheld	2	msg
			StanPottinger@aol.com,bra			AC Privilege and Work			
			d@pathtojustice.com,cassell			Product/joint			
			p@law.utah.edu,robiejenna			defense/commo			
7	2/21/2015 16:45	Sigrid McCawley	g@y7mail.com	Smccawley@BSFLLP.com	Discussion of evidence among client and attorneys	n interest	Withheld	2	msg
	2,21,2013 10.43	Dibita Miccarricy	Be 17 manicom	STREET TO BE DOT LET TOOM	Discussion of evidence among electic and accorneys	11 11/10/1030	· · · · · · · · · · · · · · · · · · ·		איייי

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Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
						AC Privilege and			
						Work			
						Product/joint			
_	2/24/2045 46 50	What is 61 ff	C In ORGELLE			defense/commo	Marilala ala	_	
8	2/21/2015 16:58	Virginia Giuffre	Smccawley@BSFLLP.com		Discussion of evidence among client and attorney	n interest	Withheld	2	msg
						AC Privilege and Work			
				StanPottinger@aol.com,cassellp@l		Product/joint			
				aw.utah.edu,robiejennag@y7mail.c		defense/commo			
0	2/21/2015 17:05	Brad Edwards	Smccawley@BSFLLP.com	om	Discussion of evidence among client and attorneys	n interest	Withheld	,	msa
9	2/21/2013 17.03	brad Edwards	Sinccawley@b3i LLi .com		Discussion of evidence among client and attorneys	AC Privilege and	vvitimeta	2	msg
						Work			
						Product/joint			
						defense/commo			
10	2/21/2015 17:10	Sigrid McCawley	robiejennag@y7mail.com		Discussion of evidence among client and attorney	n interest	Withheld	3	msg
	· ·	,	, 5=1		,	AC Privilege and			11158
						Work			
						Product/joint			
						defense/commo			
11	2/21/2015 17:16	Virginia Giuffre	Smccawley@BSFLLP.com		Discussion of evidence among client and attorneys	n interest	Withheld	3	msg
						AC Privilege and			
						Work			
				StanPottinger@aol.com,brad@pat		Product/joint			
				htojustice.com,cassellp@law.utah.		defense/commo			
12	2/23/2015 14:21	Sigrid McCawley	robiejennag@y7mail.com	edu	Discussion of thoughts and impressions of attorneys	n interest	Withheld	1	msg
						AC Privilege and			
						Work			
			6 1 0005110			Product/joint			
	2/22/2015 14:20	Cton Dottingon @ool com	-	brad@pathtojustice.com,cassellp@		defense/commo n interest	\\/;+bbald		
13	2/23/2015 14:29	StanPottinger@aol.com	biejennag@y7mail.com	law.utah.edu	Discussion of thoughts and impressions of attorneys		Withheld	1	msg
						AC Privilege and Work			'
				StanPottinger@aol.com,brad@pat		Product/joint			
				htojustice.com,cassellp@law.utah.		defense/commo			
14	2/23/2015 16:01	Virginia Giuffre	Smccawley@BSFLLP.com	edu	Discussion of thoughts and impressions of attorneys	n interest	Withheld	1	msg
17	_,,					AC Privilege and			11136
						Work			'
						Product/joint			'
					Email chain with McCawley, Giuffre, and Paralegals re seeking	defense/commo			'
15	2/24/2015 17:51	Sigrid McCawley	robiejennag@y7mail.com		information to assist in legal advice, with attachment	n interest	Withheld	4	msg

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Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
						AC Privilege and			
						Work			
						Product/joint			
						defense/commo			
16					Attached case research	n interest	Withheld	14	rtf
						AC Privilege and			
						Work			
						Product/joint			
					Email chain with Giuffre, McCawley and legal assistant re legal	defense/commo			
17	2/26/2015 12:59	Virginia Giuffre	Smccawley@BSFLLP.com		document, with attachment	n interest	Withheld	1	msg
						AC Privilege and			
						Work			
						Product/joint			
						defense/commo			
18					Attached draft legal document	n interest	Withheld	1	jfif
						AC Privilege and			
						Work			
						Product/joint			
					Email with Giuffre, McCawley, Edwards and Henderson re	defense/commo			
19	2/28/2015 17:47	Virginia Giuffre	Smccawley@BSFLLP.com		discussion of draft statement	n interest	Withheld	3	msg
						AC Privilege and			
						Work			
						Product/joint			
					Email chain with Giuffre, Edwards, McCawley, Henderson and	defense/commo			
20	3/13/2015 17:29	Stan Pottinger	robiejennag@y7mail.com	htojustice.com	Pottinger re legal advice on media issues	n interest	Withheld	2	msg
						AC Privilege and			
						Work			
						Product/joint			
					Email chain with Giuffre, Edwards, McCawley and Pottinger re	defense/commo			
21	3/13/2015 17:49	Virginia Giuffre	stanpottinger@aol.com		legal advice on media issues	n interest	Withheld	2	msg
						AC Privilege and			
						Work			
						Product/joint			
					Email chain with Giuffre, Edwards, McCawley, Henderson and	defense/commo			
22	3/13/2015 17:56	StanPottinger@aol.com	robiejennag@y7mail.com	htojustice.com	Pottinger re legal advice on media issues	n interest	Withheld	3	msg
						AC Privilege and			
						Work			
						Product/joint			
			StanPottinger@aol.com,robi		Email chain with Giuffre, Edwards, McCawley, Henderson and	defense/commo			
23	3/13/2015 18:00	Brad Edwards	ejennag@y7mail.com	Smccawley@BSFLLP.com	Pottinger re legal advice on media issues	n interest	Withheld	3	msg

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Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
						AC Privilege and			
						Work			
						Product/joint			
					Email chain with Giuffre, Edwards, McCawley, Henderson and	defense/commo			
24	3/13/2015 18:24	Virginia Giuffre	brad@pathtojustice.com		Pottinger re legal advice on media issues	n interest	Withheld	4	msg
						AC Privilege and			
						Work			
						Product/joint			
					Email chain with Giuffre, Edwards, McCawley, Henderson and	defense/commo			
25	3/13/2015 18:25	Virginia Giuffre	StanPottinger@aol.com		Pottinger re legal advice on media issues	n interest	Withheld	3	msg
23	0,10,1010 10.20		Starringer C demostri		- ottinger re regar autros on meana issues	AC Privilege and		3	11136
						Work			
						Product/joint			
				Smccawley@BSFLLP.com,StanPotti	Email chain with Giuffre, Edwards, McCawley, Henderson and	defense/commo			
	2/12/2015 21.52	Vincinia Civiffua	brad @nathtaiustica com	• -		*	\A/:+bbbald		
26	3/13/2015 21:53	Virginia Giuffre	brad@pathtojustice.com	nger@aol.com	Pottinger re legal advice on media issues	n interest	Withheld	4	msg
						AC Privilege and			
						Work			
						Product/joint			
					Email chain with Giuffre, Edwards, McCawley, Henderson and	defense/commo			
27	3/13/2015 23:38	Brad Edwards	robiejennag@y7mail.com		Pottinger re legal advice on media issues	n interest	Withheld	4	msg
						AC Privilege and			
						Work			
						Product/joint			
					Email chain with Giuffre, Edwards, McCawley, Henderson and	defense/commo			
28	3/13/2015 23:40	Virginia Giuffre	brad@pathtojustice.com		Pottinger re legal advice on media issues	n interest	Withheld	4	msg
		†				†	1		8
						Attorney			
						Client/joint			
			Smccawley@BSFLLP.com,bra			defense/commo			
			d@pathtojustice.com,stanp		Providing information to assist in legal advice re potential legal	n interest/work			
20	3/17/2015 15:20	Virginia Giuffre	ottinger@aol.com		action, with attachments	product	Withheld	4	
29	3/17/2013 13.20	Viigiilla Giuille	ottiliger@aoi.com		action, with attachments	product	witimeta	1	msg
						<b>.</b>			
						Attorney			
						Client/joint			
			Smccawley@BSFLLP.com,bra			defense/commo			
			d@pathtojustice.com,robiej		Email chain with Giuffre, Edwards, Pottinger and McCawley re	n interest/work			
30	3/17/2015 18:40	Stan	ennag@y7mail.com		legal advice related to VRS	product	Withheld	1	msg

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Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
31	3/17/2015 19:42	Virginia Giuffre	stanpottinger@aol.com		Email chain with Giuffre, Edwards, Pottinger and McCawley re legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
32	3/20/2015 15:43	Sigrid McCawley	brad@pathtojustice.com,ro biejennag@y7mail.com,stan pottinger@aol.com	aortiz@BSFLLP.com,brittany@path tojustice.com	Email chain with Giuffre, Edwards, Henderson, Pottinger, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
33	3/20/2015 15:57	Sigrid McCawley	robiejennag@y7mail.com		Providing legal advice re potential deposition	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
34	3/24/2015 21:19	Sigrid McCawley	robiejennag@y7mail.com	aortiz@BSFLLP.com	Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
35	3/24/2015 21:21	Virginia Giuffre	Smccawley@BSFLLP.com	aortiz@BSFLLP.com	Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
36	3/24/2015 21:36	Andres Ortiz	Smccawley@BSFLLP.com,ro biejennag@y7mail.com		Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg

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Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Type
37	3/24/2015 22:21	Virginia Giuffre	aortiz@BSFLLP.com		Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	3	msg
38	3/26/2015 2:00	Sigrid McCawley	robiejennag@y7mail.com	Smccawley@BSFLLP.com,StanPotti nger@aol.com,brad@pathtojustice .com,brittany@pathtojustice.com,e perez@BSFLLP.com	Email chain with Giuffre, Edwards, Henderson, Pottinger, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
39	3/26/2015 2:21	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
40	3/26/2015 2:22	Sigrid McCawley	robiejennag@y7mail.com		Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
41	3/26/2015 3:00	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
42	4/1/2015 21:32	Virginia Giuffre	Smccawley@BSFLLP.com		Giuffre conveying information sought by attorney to assist in legal advice with attachments	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg

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Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
42	4/2/2015 7:01	Brittany Henderson	robiejennag@y7mail.com	eperez@BSFLLP.com	Providing draft legal document for client review, with attachment	Attorney Client/joint defense/commo n interest/work product	Withheld		mea
43	4/2/2015 7.01	Brittary neriderson	тоыејеннадшулнан.сон	ерегедшьзгыг.соп		AC Privilege and Work Product/joint defense/commo		1	msg
44				brad@pathtojustice.com,eperez@	Attached Draft legal document  Email chain with Giuffre, Henderson, Edwards and legal	n interest  AC Privilege and Work  Product/joint defense/commo	Withheld	15	pdf
45	4/3/2015 15:32	Brittany Henderson	robiejennag@y7mail.com	BSFLLP.com	assistant re legal document, with attachment	n interest  AC Privilege and Work  Product/joint defense/commo	Withheld	2	msg
46					Attached draft legal document	n interest		15	pdf
47	4/8/2015 20:34	Virginia Giuffre	Smccawley@BSFLLP.com		Seeking legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
48	4/9/2015 3:23	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re advice re legal filings, with attachments	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
49	4/9/2015 7:16	Sigrid McCawley	StanPottinger@aol.com,bra d@pathtojustice.com,robiej ennag@y7mail.com	brittany@pathtojustice.com,sperki ns@BSFLLP.com	Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice re media issues	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg

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Log							Privilege		Doc
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50	4/9/2015 9:26	Brad Edwards	Smccawley@BSFLLP.com	robiejennag@y7mail.com	Email chain with Giuffre, Edwards, and McCawley re legal advice re media issues	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
51	4/9/2015 9:33	Sigrid McCawley	robiejennag@y7mail.com		Email chain with Giuffre and McCawley re legal advice re media issues	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
52	4/9/2015 12:46	Sigrid McCawley	robiejennag@y7mail.com		Conveying legal advice re draft legal documents to client, with attachments	AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	msg
53					Conveying legal advice re draft legal documents to client, with attachments	AC Privilege and Work Product/joint defense/commo n interest	Withheld	14	docx
54					Conveying legal advice re draft legal documents to client, with attachments	AC Privilege and Work Product/joint defense/commo n interest	Withheld	12	docx
55					Conveying legal advice re draft legal documents to client, with attachments	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	docx
56	4/10/2015 14:59	Sigrid McCawley	robiejennag@y7mail.com	StanPottinger@aol.com,brad@pat htojustice.com	Providing legal advice re media issues	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg

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Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
						Attorney Client/joint defense/commo			
_	4/10/2015 15:37	Virginia Giuffre	Smccawley@BSFLLP.com		Regarding legal advice re media issues	n interest/work product	Withheld	1	
57	4/10/2013 13.37	Virginia Giunie	Sinccawley@b3rLLr.com		negal ullig legal advice le filedia issues	AC Privilege and	wittillelu	1	msg
58	4/10/2015 17:31	Sigrid McCawley	robiejennag@y7mail.com	StanPottinger@aol.com,brad@pat htojustice.com,brittany@pathtojus tice.com,eperez@BSFLLP.com	Email chain with Giuffre, McCawley, Henderson, Edwards, Pottinger and legal assistant re legal documents, with attachments	Work Product/joint defense/commo n interest	Withheld	2	msg
30	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		reasjemege y			AC Privilege and Work Product/joint defense/commo			11136
59					Attached draft legal document	n interest	Withheld	3	pdf
60					Attached draft legal document	AC Privilege and Work Product/joint defense/commo n interest	Withheld	21	pdf
61	4/10/2015 17:40	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS	Attorney Client/joint defense/commo	Withheld	2	msg
62	4/10/2015 19:10	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
63	4/10/2015 19:28	Sigrid McCawley	robiejennag@y7mail.com		Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg

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Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
64	4/10/2015 19:33	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
65	4/10/2015 20:03	Sigrid McCawley	robiejennag@y7mail.com		Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
66	4/10/2015 20:04	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
67	4/10/2015 20:04	Sigrid McCawley	robiejennag@y7mail.com		Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
68	4/10/2015 23:46	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley legal assistant re seeking and providing information sought by attorney to assist in providing legal advice, with attachments	AC Privilege and Work Product/joint defense/commo n interest	Withheld	3	msg
69	4/13/2015 13:52	Sigrid McCawley	robiejennag@y7mail.com	StanPottinger@aol.com,brad@pat htojustice.com	Email chain with Giuffre, Pottinger, Edwards and McCawley re legal advice regarding potential public statements	AC Privilege and Work Product/joint defense/commo n interest	Withheld	3	msg
70	4/13/2015 13:56	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, Pottinger, Edwards and McCawley re legal advice regarding media issues	AC Privilege and Work Product/joint defense/commo n interest	Withheld	3	msg

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Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
71	4/14/2015 23:38	Brad Edwards	Smccawley@BSFLLP.com,bri ttany@pathtojustice.com,ro biejennag@y7mail.com,stan pottinger@aol.com		Providing legal advice related to VRS	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
72	4/16/2015 11:14	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re legal advice regarding media issues	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
73	4/16/2015 11:47	Sigrid McCawley	robiejennag@y7mail.com		Email chain with Giuffre and McCawley re legal advice regarding media issues	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
74	4/24/2015 19:22	Sigrid McCawley	robiejennag@y7mail.com		Providing legal advice re records retention, with attachments	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
75					Attached letter providing legal advice re document retention	Attorney Client/joint defense/commo n interest/work product	Withheld	2	pdf
76	4/24/2015 19:59	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re legal advice regarding potential deposition	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg

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Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
						Attorney Client/joint defense/commo n interest/work			
77	4/27/2015 21:20	Brad Edwards	robiejennag@y7mail.com	Smccawley@BSFLLP.com	Seeking information to assist in providing legal advice	product	Withheld	1	msg
78	4/30/2015 6:42	Brittany Henderson	eperez@BSFLLP.com	Smccawley@BSFLLP.com,brad@pat htojustice.com,robiejennag@y7mai I.com		AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	msg
79	4/30/2015 7:02	Brittany Henderson	robiejennag@y7mail.com		Email chain with Giuffre, Henderson and paralegal re seeking and providing information to assist in providing legal advice	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
80	4/30/2015 7:05	Virginia Giuffre	brittany@pathtojustice.com		Email chain with Giuffre, Henderson, Edwards, McCawley and legal assistant re seeking information to assist in providing legal advice	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
81	5/4/2015 20:04	Virginia Giuffre	brittany@pathtojustice.com		Email chain with Giuffre, Henderson, Edwards, McCawley and legal assistant re seeking information to assist in providing legal advice, with attachment	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
82	5/11/2015 18:20	Sigrid McCawley	robiejennag@y7mail.com	Smccawley@BSFLLP.com	Email chain with McCawley, Giuffre, Edwards, Pottinger, Henderson and Paralegal re seeking and providing information to assist in legal advice, with attachments	AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	msg
83	5/11/2015 18:34	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley, Edwards, Pottinger and Paralegal re seeking information to assist in providing legal advice re potential litigation	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg

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Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
84	5/11/2015 18:40	Sigrid McCawley	robiejennag@y7mail.com		Email chain with Giuffre and McCawley re case research, with attachment	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
85	5/11/2015 18:45	Sigrid McCawley	brad@pathtojustice.com,ro biejennag@y7mail.com		Providing and seeking information to assist in legal advice re potential legal action, with attachment	AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	msg
86	5/11/2015 18:47	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re seeking information to assist in providing legal advice re potential litigation	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
87	5/11/2015 18:56	Virginia Giuffre	brad@pathtojustice.com		Email chain with Giuffre, McCawley, Edwards, Pottinger and Paralegal re seeking information to assist in providing legal advice re potential litigation	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
88	5/17/2015 22:37	Sigrid McCawley	robiejennag@y7mail.com		Providing litigation documents to client, with attachments	Attorney Client/joint defense/commo n interest/work product	Withheld	3	msg
89					Attached draft legal agreement	AC Privilege and Work Product/joint defense/commo n interest	Withheld	10	pdf
90	5/17/2015 22:40	Sigrid McCawley	robiejennag@y7mail.com		Providing legal advice re legal agreement, with attachment	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg

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Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
91	5/18/2015 18:40	Virginia Giuffre	Smccawley@BSFLLP.com		Discussion of confidential agreement, with attachments	AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	msg
92	2, 22, 23 23	g	2 22 22 22 22 22 22 22 22 22 22 22 22 2		Attached confidential agreement page	Attorney Client/joint defense/commo n interest/work product	Withheld	1	jfif
93					Attached confidential agreement page	Attorney Client/joint defense/commo n interest/work product	Withheld	1	jfif
94	6/5/2015 19:16	Sigrid McCawley	robiejennag@y7mail.com		Conveying attorney mental impression regarding hearing	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
95	6/6/2015 17:20	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re attorney mental impression regarding hearing	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
96	6/25/2015 2:26	Sigrid McCawley	robiejennag@y7mail.com		Providing advice re status and strategy of ongoing legal matters	Attorney Client/joint defense/commo n interest/work product	Withheld	6	msg

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Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
97	7/17/2015 14:19	Sigrid McCawley	robiejennag@y7mail.com	eperez@BSFLLP.com	Discussion with S. McCawley regarding file related to representation by B. Josefsberg	Attorney Client/joint defense/commo n interest/work product	Withheld	4	msg
98	7/27/2015 21:53	Virginia Giuffre	Smccawley@BSFLLP.com		Providing information to assist in legal advice re potential litigation	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
99	7/29/2015 19:45	Sigrid McCawley	robiejennag@y7mail.com	StanPottinger@aol.com	Conveying legal advice on media issues	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
100	8/5/2015 19:51	Sigrid McCawley	robiejennag@y7mail.com		Email chain with Giuffre, McCawley and paralegals re information sought to assist in providing legal advice	AC Privilege and Work Product/joint defense/commo n interest	Withheld	1	meg
100	8/6/2015 2:14	Sigrid McCawley	robiejennag@y7mail.com		Email chain with Giuffre, McCawley, legal intern and paralegal reseeking information to assist in providing legal advice repotential litigation	AC Privilege and Work	Withheld	2	msg msg
102	8/6/2015 2:45	Sigrid McCawley	robiejennag@y7mail.com	brad@pathtojustice.com	Email chain with Giuffre, McCawley, legal intern, Edwards and paralegal re seeking information to assist in providing legal advice re potential litigation	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
103	8/6/2015 2:55	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley, legal intern and paralegal reseeking information to assist in providing legal advice repotential litigation	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg

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Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
104	8/6/2015 3:48	Sigrid McCawley	robiejennag@y7mail.com	Smccawley@BSFLLP.com,brad@pat htojustice.com	Email chain with McCawley, Giuffre, and Paralegals re seeking information to assist in legal advice, with attachments	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
105	8/6/2015 3:51	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley, legal intern and paralegal reseeking information to assist in providing legal advice repotential litigation	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
106	9/1/2015 18:54	Sigrid McCawley	robiejennag@y7mail.com	brad@pathtojustice.com,brittany@ pathtojustice.com	Providing and seeking information to assist in legal advice re potential legal action, with attachment	AC Privilege and Work Product/joint defense/commo n interest	Withheld	2	msg
107	9/7/2015 18:24	Virginia Giuffre	brad@pathtojustice.com,sm ccawley@bsfllp.com,stanpot tinger@aol.com		Providing information sought by attorneys to provide legal advice, with attachment	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
108					Attached Information sought by attorneys to provide legal advice	AC Privilege and Work Product/joint defense/commo n interest	Withheld	4	docx
109	9/7/2015 18:58	Sigrid McCawley	brad@pathtojustice.com,ro biejennag@y7mail.com,stan pottinger@aol.com		Email chain with Giuffre, Edwards, Pottinger and McCawley re collection of information to assist in providing legal advice re potential litigation	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
110	9/15/2015 21:58	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re draft legal document relating to litigation	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg

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Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
111	9/15/2015 22:04	Sigrid McCawley	robiejennag@y7mail.com		Email chain with Giuffre and McCawley re draft legal document relating to litigation	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
112	9/15/2015 22:07	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re draft legal document relating to litigation	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg
113	9/20/2015 12:15	Sigrid McCawley	robiejennag@y7mail.com	brad@pathtojustice.com	Conveying information about potential legal action.	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
114	9/20/2015 14:47	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re potential legal action.	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
115	9/20/2015 19:16	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re potential legal action.	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg
116	9/20/2015 19:29	Sigrid McCawley	robiejennag@y7mail.com		Email chain with Giuffre and McCawley re potential legal action.	Attorney Client/joint defense/commo n interest/work product	Withheld	2	msg

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Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
						Attorney Client/joint defense/commo			
						n interest/work			
117	9/20/2015 19:30	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re potential legal action.	product	Withheld	2	msg
						AC Privilege and Work Product/joint defense/commo			
118	9/21/2015 14:48	Sigrid McCawley	robiejennag@y7mail.com		Communication re initiation of lawsuit, with attachments	n interest	Withheld	1	msg
						AC Privilege and Work Product/joint defense/commo			
119					Attached draft legal document relating to litigation	n interest	Withheld	12	pdf
120					Attached draft legal document relating to litigation	Attorney Client/joint defense/commo n interest/work product	Withheld	2	pdf
121					Attached draft legal document relating to litigation	Attorney Client/joint defense/commo n interest/work product	Withheld	2	pdf
122					Attached draft legal document relating to litigation	Attorney Client/joint defense/commo n interest/work product	Withheld	3	pdf
123	9/21/2015 14:51	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre and McCawley re potential legal action.	Attorney Client/joint defense/commo n interest/work product	Withheld	1	msg

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ID							Privilege		Doc
	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
	Emails, letters, and other communications	Meredith Schultz, David Boies, Jack Scarola, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal advice and	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson, Sigrid McCawley, Meredith Schultz, David Boies, Jack Scarola, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal advice and representation		for attaching attorney work product related to the CVNA case,		Withheld	Approx. 1.3K docs overlapping with other cases	

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Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Type
					Plaintiff has objected that Defendant's requests are overly				
					broad and unduly burdensome, as individually logging all				
					privileged responsive documents would be overly burdensome.				
					Plaintiff contends that requests targeting such privileged				
					information are not reasonably calculated to lead to the				
					discovery of admissible evidence, are not important to resolving				
					the issues, are not relevant to any party's claim or defense, are				
					not proportional to the needs of the case, and creates a heavy				
					burden on Plaintiff that outweighs its benefit. Therefore,				
					Plaintiff has employed categorical logging pursuant to Local Civil				
		Virginia Giuffre, Brad			Rule 26.2(c). Correspondence re: Giuffre v. Maxwell ("Maxwell				
		Edwards, Paul Cassell,			case"), 15-cv-07433-RWS, pending in the Southern District of				
		Brittany Henderson,	Virginia Giuffre, Brad		New York, since the date of filing, September 21, 2015.				
		Sigrid McCawley,	Edwards, Paul Cassell,		Documents withheld pursuant to the privileges asserted				
		Meredith Schultz, David	Brittany Henderson, Sigrid		included communications from Ms. Giuffre to the attorneys				
		Boies, Stephen Zach,	McCawley, Meredith		listed seeking legal advice related to the Maxwell case,				
		Stan Pottinger, Ellen	Schultz, David Boies,		communications from the attorneys to Ms. Giuffre giving legal				
		Brockman, Legal	Stephen Zach, Stan		advice or giving attorney mental impressions related to the				
		Assistants, Professionals	Pottinger, Ellen Brockman,		Maxwell case, communications sending or attaching attorney	AC Privilege and		Approx. 1.3K	
		retained by attorneys to	Legal Assistants,		work product related to the Maxwell case, and/or	Work		docs	
	Emails, letters, and	aid in the rendition of	Professionals retained by		communications sending or attaching client revisions to	Product/joint		overlapping	
	other communications	legal advice and	attorneys to aid in the		attorney work product related to the Maxwell case, and	defense/commo		with other	
126	from 9/21/15 - Present	representation	rendition of legal advice and		communications re evidence.	n interest	Withheld	cases	

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Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
									l
		Virginia Giuffre, Brad			Plaintiff has objected that Defendant's requests are overly broad and unduly burdensome, as individually logging all privileged responsive documents would be overly burdensome. Plaintiff contends that requests targeting such privileged information are not reasonably calculated to lead to the discovery of admissible evidence, are not important to resolving the issues, are not relevant to any party's claim or defense, are not proportional to the needs of the case, and creates a heavy burden on Plaintiff that outweighs its benefit. Therefore, Plaintiff has employed categorical logging pursuant to Local Civil Rule 26.2(c). Correspondence re: <i>Bradley Edwards and Paul</i>				
		Edwards, Paul Cassell,			Cassell v. Alan Dershowitz ("Dershowitz case"), Case no. 15-				ł
		Brittany Henderson,	Virginia Giuffre, Brad		000072, pending in the Seventeenth Judicial Circuit, Broward				1
		Sigrid McCawley,	Edwards, Paul Cassell,		County, Florida. Documents withheld pursuant to the privileges				1
		Meredith Schultz, David	Brittany Henderson, Sigrid		asserted included communications from Ms. Giuffre to the				1
		Boies, Stephen Zach,	McCawley, Meredith		attorneys listed seeking legal advice related to the Dershowitz				1
		<u> </u>	Schultz, David Boies,		case, communications from the attorneys to Ms. Giuffre giving				1
		Brockman, Legal	Stephen Zach, Stan		legal advice or giving attorney mental impressions related to the				1
		Assistants, Professionals	Pottinger, Ellen Brockman,		Dershowitz case, communications sending or attaching attorney	AC Privilege and		Approx. 1.3K	i I
	Emails, letters, and	retained by attorneys to	Legal Assistants,		work product related to the Dershowitz case, and/or	Work		docs	i
	other communications	aid in the rendition of	Professionals retained by		communications sending or attaching client revisions to	Product/joint		overlapping	i I
	from January 2015 -	legal advice and	attorneys to aid in the		attorney work product related to the Dershowitz case, and	defense/commo		with other	i l
127	Present	representation	rendition of legal advice and		communications re evidence.	n interest	Withheld	cases	i

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Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
ID	Emails, letters, and other communications	Virginia Giuffre, Bob Josefsberg, Katherine W. Ezell, Amy Ederi, other Podhurst attorneys, Legal Assistants, and	Virginia Giuffre, Bob Josefsberg, Katherine W. Ezell, Amy Ederi, other Podhurst attorneys, Legal Assistants, and Professionals retained by attorneys to aid in the rendition of legal	CC Address	Plaintiff has objected that Defendant's requests are overly broad and unduly burdensome, as individually logging all privileged responsive documents would be overly burdensome. Plaintiff contends that requests targeting such privileged information are not reasonably calculated to lead to the discovery of admissible evidence, are not important to resolving the issues, are not relevant to any party's claim or defense, are not proportional to the needs of the case, and creates a heavy burden on Plaintiff that outweighs its benefit. Therefore, Plaintiff has employed categorical logging pursuant to Local Civil Rule 26.2(c). Correspondence re: Jane Doe No. 102 v. Jeffrey Epstein ("Epstein case"), Case No. 09-80656-CIV-Marra/Johnson (Southern District of Florida). Documents withheld pursuant to the privileges asserted included communications from Ms. Giuffre to the attorneys listed seeking legal advice related to the Epstein case, communications from the attorneys to Ms. Giuffre giving legal advice or giving attorney mental impressions related to the Epstein case, communications sending or attaching attorney work product related to the Epstein case, and/or communications sending or attaching client revisions to attorney work product related to the Epstein case, and		Action	Approx. 1.3K docs overlapping with other	
128	from 2009 - Present	rendition of legal advice	advice		communications re evidence.	n interest	Withheld	cases	
129	6/10/2015	Virginia Giuffre	robiejennag@y7mail.com		Email chain with Giuffre and McCawley seeking information to assist with attorney advice.  Letter from Virginia Giuffre to David Boies conveying requested	Attorney Client  AC Privilege and	Withheld	2	msg
130				0.00511.5	information to assist in providing legal advice.	Work Product	Withheld	26	pdf
131	4/30/2015	Brittany Henderson	eperez@BSFLLP.com	Smccawley@BSFLLP.com,brad@pat htojustice.com,robiejennag@y7mai l.com	Communication re VRS registrations	AC Privilege and Work Product	Withheld	1	msg
132	4/29/2015	Andres Ortiz	bh699@nova.edu	Smccawley@BSFLLP.com,brad@pat htojustice.com,garvin@lclark.edu,r obiejennag@y7mail.com Smccawley@BSFLLP.com,brad@pat	Email chain with McCawley, Edwards, Garvin, Henderson, Giuffre and BSF staff re legal advice re VRS communications.	AC Privilege and Work Product	Withheld	1	msg
133	4/29/2015	brittany henderson	aortiz@BSFLLP.com	htojustice.com,garvin@lclark.edu,r obiejennag@y7mail.com	Communication re legal advice re VRS communications.	AC Privilege and Work Product	Withheld	1	msg

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Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
				Consequence OFFILD complexittent	Fernil phain with Consell McCourley Edwards Comin Balant				
				1	Email chain with Cassell, McCawley, Edwards, Garvin, Beloof, Henderson, Giuffre and BSF staff re legal advice re VRS	AC Privilege and			
124	4/17/2015	Paul Cassell	brad@pathtojustice.com	com,robiejennag@y7mail.com	registrations.	Work Product	Withheld	_	
134	4/17/2013	Paul Cassell	brad@patritojustice.com		Email chain with Cassell, McCawley, Edwards, Garvin, Beloof,	WOIK PIOUUCE	withheld	5	msg
			hrad@nathtoiustice.com.cas		Henderson, Giuffre and BSF staff re legal advice re VRS	AC Privilege and			
135	4/17/2015	Sigrid McCawley	sellp@law.utah.edu	.com	registrations.	Work Product	Withheld	4	mca
133	4/17/2013	Jigita Wiccawicy	3chp@law.atam.caa		registrations.	WorkTroddet	Withinela	4	msg
				  Smccawlev@BSFLLP.com.brittanv@	Email chain with Cassell, McCawley, Edwards, Garvin, Beloof,				
				pathtojustice.com,eperez@BSFLLP.	Henderson, Giuffre and BSF staff re legal advice re VRS	AC Privilege and			
136	4/17/2015	Brad Edwards	cassellp@law.utah.edu	com,robiejennag@y7mail.com	registrations.	Work Product	Withheld	4	msg
	· ·		1 2	, , , , , , , , , , , , , , , , , , , ,	Email chain with Giuffre and McCawley re media				1110
137	2/26/2015	Sigrid McCawley	robiejennag@y7mail.com		communications.	Attorney Client	Withheld	1	msg
138	2/26/2015	Sigrid McCawley	robiejennag@y7mail.com		Communication re media communications.	Attorney Client	Withheld	1	msg
					Email chain with Giuffre, McCawley, Edwards, Pottinger and BSF				
139	2/11/2016	Sigrid McCawley	robiejennag@y7mail.com		staff re media communications.	Attorney Client	Redacted	3	msg
			StanPottinger@aol.com,robi	Lcarlsen@BSFLLP.com,brad@patht	Email chain with Giuffre, McCawley, Edwards, Pottinger and BSF				
140	2/11/2016	Sigrid McCawley	ejennag@y7mail.com	ojustice.com	staff re media communications.	Attorney Client	Redacted	3	msg
				Lcarlsen@BSFLLP.com,Smccawley					
				@BSFLLP.com,brad@pathtojustice.	Email chain with Giuffre, McCawley, Edwards, Pottinger and BSF				
141	2/11/2016	StanPottinger@aol.com	robiejennag@y7mail.com	com	staff re media communications.	Attorney Client	Redacted	3	msg
					Email chain with Giuffre and Pottinger re media				
142	2/9/2016	StanPottinger@aol.com	robiejennag@y7mail.com		communications.	Attorney Client	Redacted	2	msg
					Letter from Virginia Giuffre to David Boies conveying requested	AC Privilege and	NA / it la la a la l		
143					information to assist in providing legal advice.	Work Product	Withheld	26	pdf
					Letter from Virginia Giuffre to David Boies conveying requested	AC Privilege and			
144					information to assist in providing legal advice.	Work Product	Withheld	23	docx
144					Information to assist in providing legal advice.	WorkTroddet	Withinela	23	uocx
145	6/10/2015	Virginia Giuffre	robiejennag@y7mail.com		Email chain with Giuffre and McCawley re ongoing litigation.	Attorney Client	Withheld	2	msg
- 10	, , ,		, 50,	Smccawley@BSFLLP.com,bh699@n	, , ,	,			8
				-	Email chain with Henderson, McCawey, Edwards, Garvin and				
146	4/29/2015	Virginia Giuffre	aortiz@BSFLLP.com	arvin@lclark.edu	BSF staff re VRS communications.	Attorney Client	Withheld	2	msg
					Email chain with Boylan, Giuffre, McCawley, and BSF staff re				
147	4/10/2015	Virginia Giuffre	rebecca.boylan@yahoo.com		legal advice re VRS registrations.	Attorney Client	Withheld	2	msg
148	2/26/2015	Virginia Giuffre	Smccawley@BSFLLP.com		Email conveying legal advice re media communications.	Attorney Client	Withheld	1	msg
					Email chain with Giuffre and Pottinger re media				
149	2/11/2015	Virginia Giuffre	StanPottinger@aol.com		communications	Attorney Client	Redacted	3	msg

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Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
					Email chain with Giuffre, McCawley, Pottinger and BSF staff re				
150	2/11/2015	Virginia Giuffre	Smccawley@BSFLLP.com		media communications.	Attorney Client	Redacted	3	msg
						A.C. Duit til a man ann al			
454	1/12/2015	Vincinia Civiffua	Cton Dottingon @ool oom		Email shair with Dattinger and Civifus as anticipated litigation	AC Privilege and	\\/:+bbald		
151	1/13/2015	Virginia Giuffre	StanPottinger@aol.com		Email chain with Pottinger and Giuffre re anticipated litigation.	Work Product	Withheld	1	msg
					Plaintiff has objected that Defendant's requests are overly				
					broad and unduly burdensome, as individually logging all				
					privileged responsive documents would be overly				
					burdensome. Plaintiff contends that requests targeting				
					such privileged information are not reasonably calculated				
					to lead to the discovery of admissible evidence, are not				
					important to resolving the issues, are not relevant to any				
					party's claim or defense, are not proportional to the				
					needs of the case, and creates a heavy burden on Plaintiff				
					that outweighs its benefit. Therefore, Plaintiff has				
					employed categorical logging pursuant to Local Civil Rule				
					26.2(c). This categorical entry is regarding correspondence				
					re potential legal action against entities and individuals.				
					Documents withheld pursuant to the privileges asserted				
		Wind the City of David			included communications from Ms. Giuffre to the				
		Virginia Giuffre, Brad	Vincinia Civiffua Duad		attorneys listed seeking legal advice related to potential				
		Edwards, Paul Cassell, Brittany Henderson,	Virginia Giuffre, Brad Edwards, Paul Cassell,		law suits, communications from the attorneys to Ms.				
		Sigrid McCawley,	Brittany Henderson, Sigrid		Giuffre giving legal advice or giving attorney mental				
		Meredith Schultz, David	McCawley, Meredith		impressions related to the law suits, communications				
		Boies, Stephen Zach,	Schultz, David Boies,		sending or attaching attorney work product related to				
		Stan Pottinger, Ellen	Stephen Zach, Stan		potential lawsuits, and/or communications sending or				
		Brockman, Legal	Pottinger, Ellen Brockman,		l'	AC Privilege and			
	Emails, letters, and	Assistants, Professionals	Legal Assistants,		attaching client revisions to attorney work product related	Work		Approx. 1.3K	
	other communications	retained by attorneys to	Professionals retained by		to potential lawsuits, and communications re evidence.	Product/joint		overlapping	
	from January 2015 -	aid in the rendition of	attorneys to aid in the			defense/commo		with other	
152	Present	legal advice	rendition of legal advice			n interest	Withheld	cases	

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Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
153	Email and letter	The law enforcement entity, Virginia Giuffre, David Boies, Stan Pottinger, Sigrid McCawley, Paul Cassell, Brad Edwards	The law enforcement entity, Virginia Giuffre, David Boies, Stan Pottinger, Sigrid McCawley, Paul Cassell, Brad Edwards		Plaintiff has objected that Defendant's requests are overly broad and unduly burdensome, as individually logging all privileged responsive documents would be overly burdensome. Plaintiff contends that requests targeting such privileged information are not reasonably calculated to lead to the discovery of admissible evidence, are not important to resolving the issues, are not relevant to any party's claim or defense, are not proportional to the needs of the case, and creates a heavy burden on Plaintiff that outweighs its benefit. Therefore, Plaintiff has employed categorical logging pursuant to Local Civil Rule 26.2(c). This categorical entry is regarding correspondence re the currently ongoing criminal investigation of Defendant and others.		Withheld	approx. 57 documents	