

# **EXHIBIT C**

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
2	2/16/2015 1:05	StanPottinger@aol.com	Smccawley@BSFLLP.com,brad@pathtojustice.com,robiejennag@y7mail.com		Discussion of evidence among client and attorneys	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg
7	2/21/2015 16:45	Sigrid McCawley	StanPottinger@aol.com,brad@pathtojustice.com,cassellp@law.utah.edu,robiejennag@y7mail.com	Smccawley@BSFLLP.com	Discussion of evidence among client and attorneys	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg
9	2/21/2015 17:05	Brad Edwards	Smccawley@BSFLLP.com	StanPottinger@aol.com,cassellp@law.utah.edu,robiejennag@y7mail.com	Discussion of evidence among client and attorneys	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg
12	2/23/2015 14:21	Sigrid McCawley	robiejennag@y7mail.com	StanPottinger@aol.com,brad@pathtojustice.com,cassellp@law.utah.edu	Discussion of thoughts and impressions of attorneys	AC Privilege and Work Product/joint defense/common interest	Withheld	1	msg
13	2/23/2015 14:29	StanPottinger@aol.com	Smccawley@BSFLLP.com,robiejennag@y7mail.com	brad@pathtojustice.com,cassellp@law.utah.edu	Discussion of thoughts and impressions of attorneys	AC Privilege and Work Product/joint defense/common interest	Withheld	1	msg
14	2/23/2015 16:01	Virginia Giuffre	Smccawley@BSFLLP.com	StanPottinger@aol.com,brad@pathtojustice.com,cassellp@law.utah.edu	Discussion of thoughts and impressions of attorneys	AC Privilege and Work Product/joint defense/common interest	Withheld	1	msg
20	3/13/2015 17:29	Stan Pottinger	robiejennag@y7mail.com	Smccawley@BSFLLP.com,brad@pathtojustice.com	Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg
21	3/13/2015 17:49	Virginia Giuffre	stanpottinger@aol.com		Email chain with Giuffre, Edwards, McCawley and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg
22	3/13/2015 17:56	StanPottinger@aol.com	robiejennag@y7mail.com	Smccawley@BSFLLP.com,brad@pathtojustice.com	Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/common interest	Withheld	3	msg

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23	3/13/2015 18:00	Brad Edwards	StanPottinger@aol.com,rob i ejennag@y7mail.com	Smccawley@BSFLLP.com	Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/common interest	Withheld	3	msg
25	3/13/2015 18:25	Virginia Giuffre	StanPottinger@aol.com		Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/common interest	Withheld	3	msg
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/common interest/work product	Withheld	1	msg
32	3/20/2015 15:43	Sigrid McCawley	brad@pathtojustice.com,rob i ejennag@y7mail.com,stan pottinger@aol.com	aortiz@BSFLLP.com,br ittany@path tojustice.com	Email chain with Giuffre, Edwards, Henderson, Pottinger, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
49	4/9/2015 7:16	Sigrid McCawley	StanPottinger@aol.com,brad @pathtojustice.com,rob i ejennag@y7mail.com	brittany@pathtojus tice.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/common interest/work product	Withheld	2	msg
56	4/10/2015 14:59	Sigrid McCawley	robiejennag@y7mail.com	StanPottinger@aol.co m,brad@pat htojustice.com	Providing legal advice re media issues	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
58	4/10/2015 17:31	Sigrid McCawley	robiejennag@y7mail.com	StanPottinger@aol.co m,brad@pat htojustice.com, brittany@pathtojus tice.com,eperez@BSFL P.com	Email chain with Giuffre, McCawley, Henderson, Edwards, Pottinger and legal assistant re legal documents, with attachments	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg
69	4/13/2015 13:52	Sigrid McCawley	robiejennag@y7mail.com	StanPottinger@aol.co m,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/common interest	Withheld	3	msg

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71	4/14/2015 23:38	Brad Edwards	Smccawley@BSFLP.com,br i ttany@pathtojustice.com,ro biejennag@y7mail.com,stan pottinger@aol.com		Providing legal advice related to VRS	Attorney Client/joint defense/common 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/common interest/work product	Withheld	1	msg
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/common interest/work product	Withheld	1	msg

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125	Present	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson (and other , 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	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		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 #1 and Jane Doe #2 v. United States ("CVRA case"), Case no. 08-80736-CIV-Marra, pending in the 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 CVRA case, communications from the attorneys to Ms. Giuffre giving legal advice or giving attorney mental impressions related to the CVRA case, communications sending or attaching attorney work product related to the CVRA case, and/or communications sending or attaching client revisions to attorney work product related to the CVRA case, and communications re evidence.	AC Privilege and Work Product/joint defense/common interest	Withheld	Approx. 1.3K docs overlapping with other cases	

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126	Present	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson, Sigrid McCawley, Meredith Schultz, David Boies, Stephen Zach, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal advice and representation	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson, Sigrid McCawley, Meredith Schultz, David Boies, Stephen Zach, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal advice and		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: Giuffre v. Maxwell ("Maxwell case"), 15-cv-07433-RWS, pending in the Southern District of New York, since the date of filing, September 21, 2015. Documents withheld pursuant to the privileges asserted included communications from Ms. Giuffre to the attorneys listed seeking legal advice related to the Maxwell case, communications from the attorneys to Ms. Giuffre giving legal advice or giving attorney mental impressions related to the Maxwell case, communications sending or attaching attorney work product related to the Maxwell case, and/or communications sending or attaching client revisions to attorney work product related to the Maxwell case, and communications re evidence.	AC Privilege and Work Product/joint defense/common interest	Withheld	Approx. 1.3K docs overlapping with other cases	

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127	Present	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson, Sigrid McCawley, Meredith Schultz, David Boies, Stephen Zach, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal advice and representation	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson, Sigrid McCawley, Meredith Schultz, David Boies, Stephen Zach, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal advice and		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:Bradley Edwards and Paul Cassell v. Alan Dershowitz("Dershowitz case"), Case no. 15000072, pending in the Seventeenth Judicial Circuit, Broward County, Florida. Documents withheld pursuant to the privileges asserted included communications from Ms. Giuffre to the attorneys listed seeking legal advice related to the Dershowitz case, communications from the attorneys to Ms. Giuffre giving legal advice or giving attorney mental impressions related to the Dershowitz case, communications sending or attaching attorney work product related to the Dershowitz case, and/or communications sending or attaching client revisions to attorney work product related to the Dershowitz case, and communications re	AC Privilege and Work Product/joint defense/common interest	Withheld	Approx. 1.3K docs overlapping with other cases	
140	2/11/2016	Sigrid McCawley	StanPottinger@aol.com,rob iejennag@y7mail.com	Lcarlsen@BSFLLP.com, brad@patht ojustice.com	Email chain with Giuffre, McCawley, Edwards, Pottinger and BSF staff re media communications.	Attorney Client	Redacted	3	msg
141	2/11/2016	StanPottinger@aol.com	robiejennag@y7mail.com	Lcarlsen@BSFLLP.com, Smccawley @BSFLLP.com, brad@pathtojustice. com	Email chain with Giuffre, McCawley, Edwards, Pottinger and BSF staff re media communications.	Attorney Client	Redacted	3	msg
142	2/9/2016	StanPottinger@aol.com	robiejennag@y7mail.com		Email chain with Giuffre and Pottinger re media communications.	Attorney Client	Redacted	2	msg
149	2/11/2015	Virginia Giuffre	StanPottinger@aol.com		Email chain with Giuffre and Pottinger re media communications	Attorney Client	Redacted	3	msg
151	1/13/2015	Virginia Giuffre	StanPottinger@aol.com		Email chain with Pottinger and Giuffre re anticipated litigation.	AC Privilege and Work Product	Withheld	1	msg

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152	Present	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson, Sigrid McCawley, Meredith Schultz, David Boies, Stephen Zach, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal advice	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson, Sigrid McCawley, Meredith Schultz, David Boies, Stephen Zach, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal advice		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 potential legal action against entities and individuals. Documents withheld pursuant to the privileges asserted included communications from Ms. Giuffre to the attorneys listed seeking legal advice related to potential law suits, communications from the attorneys to Ms. Giuffre giving legal advice or giving attorney mental impressions related to the law suits, communications sending or attaching attorney work product related to potential lawsuits, and/or communications sending or attaching client revisions to attorney work product related to potential lawsuits, and communications re evidence.	AC Privilege and Work Product/joint defense/common interest	Withheld	Approx. 1.3K overlapping with other cases	



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153	Email and letter communications	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 Rule26.2(c). This categorical entry is regarding correspondence the currently ongoing criminal investigation of Defendant and others.	Public Interest	Withheld	approx .57 documents	