# **EXHIBIT C**

### Case 1:15-cv-07433-LAP Document 156-3 Filed 05/20/16 Page 2 of 9

Log	Email Sent						Privilege	Page	Doc
D	Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Count	Type
			Smccawley@BSFLLP.com,br			AC Privilege and			
			a			Work Product/joint			
	2/16/2015		d@pathtojustice.com,robiej			defense/common			
2	1:05	StanPottinger@aol.com	ennag@y7mail.com		Discussion of evidence among client and attorneys	interest	Withheld	2	msg
			StanPottinger@aol.com,bra			A C D : 'I			
			d@pathtojustice.com,cassel			AC Privilege and			
	2 /24 /2245					Work Product/joint			
_	2/21/2015		p@law.utah.edu,robiejenna			defense/common			
	16:45	Sigrid McCawley	g@y7mail.com		Discussion of evidence among client and attorneys		Withheld	2	msg
				StanPottinger@aol.co		AC Privilege and			
				m,cassellp@l		Work Product/joint			
	2/21/2015			aw.utah.edu,robiejenn		defense/common			
9	17:05	Brad Edwards	Smccawley@BSFLLP.com	ag@y7mail.c om	Discussion of evidence among client and attorneys	interest	Withheld	2	msg
				StanPottinger@aol.co					
				m,brad@pat		AC Privilege and			
				htojustice.com,		Work Product/joint			
	2/23/2015			cassellp@law.utah.	Discussion of thoughts and impressions of	defense/common			
12	14:21	Sigrid McCawley	robiejennag@y7mail.com	edu	attorneys	interest	Withheld	1	msg
						AC Privilege and			
				brad@pathtojustice.co		Work Product/joint			
	2/23/2015		Smccawley@BSFLLP.com,ro	m,cassellp@	Discussion of thoughts and impressions of	defense/common			
13	14:29	StanPottinger@aol.com	biejennag@y7mail.com	law.utah.edu	attorneys	interest	Withheld	1	msg
				StanPottinger@aol.co					
				m,brad@pat		AC Privilege and			
				htojustice.com,		Work Product/joint			
	2/23/2015			cassellp@law.utah.	Discussion of thoughts and impressions of	defense/common			
14	16:01	Virginia Giuffre	Smccawley@BSFLLP.com	edu	attorneys	interest	Withheld	1	msg
		0	1,0			AC Privilege and			-0
				Smccawley@BSFLLP.c	Email chain with Giuffre, Edwards, McCawley,	Work Product/joint			
	3/13/2015			om,brad@pat		defense/common			
20	17:29	Stan Pottinger	robiejennag@y7mail.com	htojustice.com	issues	interest	Withheld	2	msg
	17.23	otan r ottinger	Tobicjerinage y manicom	ntojustice.com	133463	AC Privilege and	vvicinicia	_	11136
						Work Product/joint			
	3/13/2015				Email chain with Giuffre, Edwards, McCawley and	defense/common			
21	17:49	Virginia Giuffre	stanpottinger@aol.com		Pottinger re legal advice on media issues	interest	Withheld	,	msg
21	17.43	viigiilla Gluille	stanpottinger@dol.com		ottinger re regar advice off friedra issues	AC Privilege and	vvicillelu		iiisg
				Smccawley@BSFLLP.c	Email chain with Giuffre, Edwards, McCawley,	Work Product/joint			
	3/13/2015			, -	1	defense/common			
22		Stan Dottingor@aol sam	robioionnag@u7mail.com	om,brad@pat	I.		Mithhald	,	mee
	17:56	StanPottinger@aol.com	robiejennag@y7mail.com	htojustice.com	issues	interest	Withheld	3	msg

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Log	Email Sent						Privilege	Page	Doc
D	Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Count	Туре
						AC Privilege and			
					Email chain with Giuffre, Edwards, McCawley,	Work Product/joint			
	3/13/2015		StanPottinger@aol.com,rob	Smccawley@BSFLLP.c	Henderson and Pottinger re legal advice on media	defense/common			
23	18:00	Brad Edwards	i ejennag@y7mail.com	om	issues	interest	Withheld	3	msg
						AC Privilege and			
					Email chain with Giuffre, Edwards, McCawley,	Work Product/joint			
	3/13/2015				Henderson and Pottinger re legal advice on media	defense/common			
25	18:25	Virginia Giuffre	StanPottinger@aol.com		issues	interest	Withheld	3	msg
						Attorney			
						Client/joint			
						defense/common			
	3/17/2015				Email chain with Giuffre, Edwards, Pottinger and	interest/work			
31	19:42	Virginia Giuffre	stanpottinger@aol.com		McCawley re legal advice related to VRS	product	Withheld	1	msg
						Attorney			
						Client/joint			
			brad@pathtojustice.com,ro	aortiz@BSFLLP.com,br	Email chain with Giuffre, Edwards, Henderson,	defense/common			
	3/20/2015		biejennag@y7mail.com,stan	ittany@path	Pottinger, McCawley and BSF staff re legal advice	interest/work			
32	15:43	Sigrid McCawley	pottinger@aol.com	tojustice.com	related to VRS	product	Withheld	1	msg
						Attorney			
						Client/joint			
			StanPottinger@aol.com,bra	brittany@pathtojustic	Email chain with Giuffre, Edwards, Henderson,	defense/common			
	4/9/2015		d@pathtojustice.com,robiej	e.com,sperki	McCawley and BSF staff re legal advice re media	interest/work			
49	7:16	Sigrid McCawley	ennag@y7mail.com	ns@BSFLLP.com	issues	product	Withheld	2	msg
						Attorney			
						Client/joint			
				StanPottinger@aol.co		defense/common			
	4/10/2015			m,brad@pat		interest/work			
56	14:59	Sigrid McCawley	robiejennag@y7mail.com	htojustice.com	Providing legal advice re media issues	product	Withheld	1	msg
				StanPottinger@aol.co					
				m,brad@pat					
				htojustice.com,		AC Privilege and			
				brittany@pathtojus	Email chain with Giuffre, McCawley, Henderson,	Work Product/joint			
	4/10/2015				Edwards, Pottinger and legal assistant re legal	defense/common			
58	17:31	Sigrid McCawley	robiejennag@y7mail.com	LP.com	documents, with attachments	interest	Withheld	2	msg
						AC Privilege and			
				StanPottinger@aol.co	Email chain with Giuffre, Pottinger, Edwards and	Work Product/joint			
	4/13/2015			m,brad@pat	McCawley re legal advice regarding potential	defense/common			
69	13:52	Sigrid McCawley	robiejennag@y7mail.com	htojustice.com	public statements	interest	Withheld	3	msg

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Log	Email Sent						Privilege	Page	Doc
ID	Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Count	Туре
	4/14/2015		Smccawley@BSFLLP.com,br i ttany@pathtojustice.com,ro biejennag@y7mail.com,stan			Attorney Client/joint defense/common interest/work			
71		Brad Edwards	pottinger@aol.com		Providing legal advice related to VRS	product	Withheld	1	msg
	7/29/2015			StanPottinger@aol.co		Attorney Client/joint defense/common interest/work			
99	19:45	Sigrid McCawley	robiejennag@y7mail.com	m	Conveying legal advice on media issues	product	Withheld	1	msg
			brad@pathtojustice.com,ro		Email chain with Giuffre, Edwards, Pottinger and	Attorney Client/joint defense/common			
	9/7/2015		biejennag@y7mail.com,stan		,	interest/work			
109	18:58	Sigrid McCawley	pottinger@aol.com		providing legal advice re potential litigation	product	Withheld	1	msg

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Log	Email Sent						Privilege	Page	Doc
ID	Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Count	Туре
					Plaintiff has objected that Defendant's requests				1
					are overly broad and unduly burdensome, as				1
					individually logging all privileged responsive				1
					documents would be overly burdensome. Plaintiff				1
					contends that requests targeting such privileged				İ
					information are not reasonably calculated to lead				1
					to the discovery of admissible evidence, are not				1
					important to resolving the issues, are not relevant				1
					to any party's claim or defense, are not				1
					proportional to the needs of the case, and creates				1
					a heavy burden on Plaintiff that outweighs its				1
					benefit. Therefore, Plaintiff has employed				1
					categorical logging pursuant to Local Civil Rule				1
					26.2(c). Correspondence re: Jane Doe #1 and Jane				
					Doe #2 v. United States ("CVRA case"), Case no. 08-				1
					80736-CIV-Marra, pending in the Southern District				
		Virginia Giuffre, Brad			of Florida. Documents withheld pursuant to the				1
		Edwards, Paul Cassell,	Virginia Giuffre, Brad		privileges asserted included communications from				
		Brittany Henderson (and	Edwards, Paul Cassell,		Ms. Giuffre to the attorneys listed seeking legal				1
		other , Sigrid McCawley,	Brittany Henderson, Sigrid		advice related to the CVRA case, communications				
		Meredith Schultz, David	McCawley, Meredith		from the attorneys to Ms. Giuffre giving legal			Appro	1
	Emails,	Boies, Jack Scarola, Stan	Schultz, David Boies, Jack		advice or giving attorney mental impressions			x. 1.3K	1
	letters, and	Pottinger, Ellen Brockman,	Scarola, Stan Pottinger,		related to the CVRA case, communications sending			docs	1
	other	Legal Assistants,	Ellen Brockman, Legal		or attaching attorney work product related to the			overla	ĺ
	communicat	Professionals retained by	Assistants, Professionals		CVRA case, and/or communications sending or	AC Privilege and		pping	ĺ
	ions from	attorneys to aid in the	retained by attorneys to aid		attaching client revisions to attorney work product	Work Product/joint		with	ĺ
	2011 -	rendition of legal advice	in the rendition of legal		related to the CVRA case, and communications re	defense/common		other	1
125	Present	and representation	advice and representation		evidence.	interest	Withheld	cases	İ

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Log	Email Sent						Privilege	Page	Doc
ID	Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Count	Туре
					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				
		Virginia Giuffre, Brad			of filing, September 21, 2015. Documents				
		Edwards, Paul Cassell,	Virginia Giuffre, Brad		withheld pursuant to the privileges asserted				
		Brittany Henderson, Sigrid	Edwards, Paul Cassell,		included communications from Ms. Giuffre to the				
		McCawley, Meredith	Brittany Henderson, Sigrid		attorneys listed seeking legal advice related to the				
		Schultz, David Boies,	McCawley, Meredith		Maxwell case, communications from the attorneys			Appro	
	Emails,	Stephen Zach, Stan	Schultz, David Boies,		to Ms. Giuffre giving legal advice or giving attorney			x. 1.3K	
	letters, and	Pottinger, Ellen Brockman,	Stephen Zach, Stan		mental impressions related to the Maxwell case,			docs	
	other	Legal Assistants,	Pottinger, Ellen Brockman,		communications sending or attaching attorney			overla	
	communicat	Professionals retained by	Legal Assistants,		work product related to the Maxwell case, and/or	AC Privilege and		pping	
		attorneys to aid in the	Professionals retained by		9	Work Product/joint		with	
	9/21/15 -	rendition of legal advice	attorneys to aid in the		revisions to attorney work product related to the	defense/common		other	
126	Present	and representation	rendition of legal advice and		Maxwell case, and communications re evidence.	interest	Withheld	cases	

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Log	Email Sent						Privilege	Page	Doc
ID	Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Count	Туре
					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,				
		Virginia Giuffre, Brad			Florida. Documents withheld pursuant to the				
		Edwards, Paul Cassell,	Virginia Giuffre, Brad		privileges asserted included communications from				
		Brittany Henderson, Sigrid	Edwards, Paul Cassell,		Ms. Giuffre to the attorneys listed seeking legal				
		McCawley, Meredith	Brittany Henderson, Sigrid		advice related to the Dershowitz case,				
	Emails,	Schultz, David Boies,	McCawley, Meredith		communications from the attorneys to Ms. Giuffre			Appro	
	letters, and	Stephen Zach, Stan	Schultz, David Boies,		giving legal advice or giving attorney mental			x. 1.3K	
	other	Pottinger, Ellen Brockman,	Stephen Zach, Stan		impressions related to the Dershowitz case,			docs	
	communicat	Legal Assistants,	Pottinger, Ellen Brockman,		communications sending or attaching attorney			overla	
	ions from	Professionals retained by	Legal Assistants,		work product related to the Dershowitz case,	AC Privilege and		pping	
	January	attorneys to aid in the	Professionals retained by		and/or communications sending or attaching	Work Product/joint		with	
	2015 -	rendition of legal advice	attorneys to aid in the		client revisions to attorney work product related	defense/common		other	
127	Present	and representation	rendition of legal advice and		to the Dershowitz case, and communications re	interest	Withheld	cases	
				Lcarlsen@BSFLLP.com,					
			StanPottinger@aol.com,rob	- '	Email chain with Giuffre, McCawley, Edwards,				
140	2/11/2016	Sigrid McCawley	i ejennag@y7mail.com	ojustice.com	Pottinger and BSF staff re media communications.	Attorney Client	Redacted	3	msg
				Lcarlsen@BSFLLP.com,					
				Smccawley					
				@BSFLLP.com,					
				brad@pathtojustice.	Email chain with Giuffre, McCawley, Edwards,		L	_	
141	2/11/2016	StanPottinger@aol.com	robiejennag@y7mail.com	com	Pottinger and BSF staff re media communications.	Attorney Client	Redacted	3	msg
	2 /2 /224 6	a. a			Email chain with Giuffre and Pottinger re media				
142	2/9/2016	StanPottinger@aol.com	robiejennag@y7mail.com		communications.	Attorney Client	Redacted	2	msg
140	2/11/2015	Minatala Civiffua	C+ D-++!		Email chain with Giuffre and Pottinger re media	A++ Cli+	D - d + . !	_	
149	2/11/2015	Virginia Giuffre	StanPottinger@aol.com		communications	Attorney Client	Redacted	3	msg
154	1/12/2015	Virginia Ciuffra	Ctan Dottingor @ and an am		Email chain with Pottinger and Giuffre re	AC Privilege and	Mith hale	4	mc~
151	1/13/2015	Virginia Giuffre	StanPottinger@aol.com		anticipated litigation.	Work Product	Withheld	1	msg

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Log	Email Sent						Privilege	Page	Doc
ID	Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Count	Туре
					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				
					correspondencere potential legal action against				
					entities and individuals. Documents withheld				
					pursuant to the privileges asserted included				
		Virginia Giuffre, Brad	Virginia Giuffre, Brad		communications from Ms. Giuffre to the attorneys				
		Edwards, Paul Cassell,	Edwards, Paul Cassell,		listed seeking legal advice related to potential law				
		Brittany Henderson, Sigrid	Brittany Henderson, Sigrid		suits, communications from the attorneys to Ms.				
	Emails,	McCawley, Meredith	McCawley, Meredith		Giuffre giving legal advice or giving attorney				
	letters, and	Schultz, David Boies,	Schultz, David Boies,		mental impressions related to the law suits,			Appro	
	other	Stephen Zach, Stan	Stephen Zach, Stan		communications sending or attaching attorney			x. 1.3K	
	communicat	Pottinger, Ellen Brockman,	Pottinger, Ellen Brockman,		work product related to potential lawsuits, and/or			overla	
	ions from	Legal Assistants,	Legal Assistants,		communications sending or attaching client	AC Privilege and		pping	
	January	Professionals retained by	Professionals retained by		revisions to attorney work product related to	Work Product/joint		with	
	2015 -	attorneys to aid in the	attorneys to aid in the		potential lawsuits, and communications re	defense/common		other	
152	Present	rendition of legal advice	rendition of legal advice		evidence.	interest	Withheld	cases	

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Log	Email Sent						Privilege	Page	Doc
ID	Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Count	Туре
					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				
		The law enforcement			a heavy burden on Plaintiff that outweighs its				
		entity, Virginia Giuffre,	The law enforcement entity,		benefit. Therefore, Plaintiff has employed				
	Email and	David Boies, Stan	Virginia Giuffre, David		categorical logging pursuant to Local Civil			approx	
	letter	Pottinger, Sigrid	Boies, Stan Pottinger, Sigrid		Rule26.2(c). This categorical entry is regarding			. 57	
	communicat	McCawley, Paul Cassell,	McCawley, Paul Cassell,		correspondence the currently ongoing criminal			docum	
153	ions	Brad Edwards	Brad Edwards		investigation of Defendant and others.	Public Interest	Withheld	ents	