EXHIBIT A

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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
	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	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		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/commo		Approx. 1.3K docs overlapping with other	
125	from 2011 - Present	representation	representation			n interest	Withheld	cases	$ldsymbol{ldsymbol{ldsymbol{eta}}}$

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page 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				
		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	<u> </u>

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

Log							Privilege		Doc
ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Page Count	Туре
128		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 advice	Virginia Giuffre, Bob Josefsberg, Katherine W. Ezell, Amy Ederi, other Podhurst attorneys, Legal Assistants, and Professionals		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 communications re evidence.	AC Privilege and Work Product/joint defense/commo n interest	Withheld	Approx. 1.3K docs overlapping with other cases	Туре
129	6/10/2015	Virginia Giuffre	robiejennag@y7mail.com		Email chain with Giuffre and McCawley seeking information to assist with attorney advice.	Attorney Client	Withheld	2	msg
130	5, 25, 2525				Letter from Virginia Giuffre to David Boies conveying requested information to assist in providing legal advice.	AC Privilege and 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		obiejennag@y7mail.com	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		Smccawley@BSFLLP.com,brad@pat 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	Type
450	2/11/2015	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley, Pottinger and BSF staff re media communications.	Attorney Client	Dodostod		1 1
150	2/11/2015	virginia Giurire	Smccawley@BSFLLP.com		media communications.	Attorney Client	Redacted	3	msg
						AC Privilege and			1 1
151	1/13/2015	Virginia Giuffre	StanPottinger@aol.com		Email chain with Pottinger and Giuffre re anticipated litigation.	Work Product	Withheld	1	mea
151	1/13/2013	Virginia Gianic	Stain ottinger@doi.com		Email chain with rottinger and didn'te re anticipated inigation.	WorkTroduct	Withintera	1	msg
									1
					L				1
					Plaintiff has objected that Defendant's requests are overly				1 1
					broad and unduly burdensome, as individually logging all				1 1
					privileged responsive documents would be overly				1
					burdensome. Plaintiff contends that requests targeting				1
					such privileged information are not reasonably calculated				1 1
					to lead to the discovery of admissible evidence, are not				1 1
					important to resolving the issues, are not relevant to any				1 1
					party's claim or defense, are not proportional to the				1 1
					needs of the case, and creates a heavy burden on Plaintiff				1
					that outweighs its benefit. Therefore, Plaintiff has				1
					employed categorical logging pursuant to Local Civil Rule				1
					26.2(c). This categorical entry is regarding correspondence				1
					re potential legal action against entities and individuals.				1
					Documents withheld pursuant to the privileges asserted				1
		Virginia Giuffre, Brad			included communications from Ms. Giuffre to the				1
		Edwards, Paul Cassell,	Virginia Giuffre, Brad		attorneys listed seeking legal advice related to potential				
		Brittany Henderson,	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				1
		Brockman, Legal	Pottinger, Ellen Brockman,		attaching client revisions to attorney work product related	AC Privilege and			
	Emails, letters, and	Assistants, Professionals	Legal Assistants,		to potential lawsuits, and communications re evidence.	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	ш