

Exhibit A
Plaintiff's Position on Docket Entries 345, 356, 362, 370, 422, 468 & 640

| Docket Entry | Plaintiff's Position |
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| 345: Plaintiff's Motion to Compel Production of Documents Subject to Improper Objection | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 344 | Already public. |
| 346 | Unseal in full. Note: Original parties agree. |
| 346-1 | Unseal in full. Note: Original parties agree. |
| 346-2 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 346-3 | Unseal in full. Note: Original parties agree. |
| 346-4 | Unsealed by Second Circuit. Note: Original parties agree. |
| 346-5 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 383 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 384 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 384-1 | Unsealed by Second Circuit. Note: Original parties agree. |
| 385 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 386 | Unseal in full. Note: Original parties agree. |
| 387 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The Original Parties sent the Non-Party deponent (Doe 91) notice of unsealing, the Non-Party deponent requested excerpts, and the Non-Party deponent did not object to unsealing within two weeks of receiving the excerpts. |
| 397 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 398 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |

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| 398-1 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 398-2 | Unseal in full. |
| 398-3 | Unseal in full. Note: Original parties agree. |
| 398-4 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The Original Parties sent the Non-Party deponent (Doe 1) notice of unsealing, the Non-Party deponent requested excerpts, and the Non-Party deponent did not object to unsealing within two weeks of receiving the excerpts. |
| 398-5 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. The Original Parties sent the Non-Party deponent (Doe 7) notice of unsealing, and the Non-Party deponent did not request excerpts. |
| 356: Plaintiff's Motion to Direct Defendant to Answer Deposition Questions | Adopt same ruling as DE 315 from second round of unsealing. |
| 357 | Adopt same ruling as DE 316 from second round of unsealing. |
| 357-1 | Adopt same ruling as DE 316-1 from second round of unsealing. |
| 357-2 | Adopt same ruling as DE 316-2 from second round of unsealing. |
| 357-3 | Adopt same ruling as DE 316-3 from second round of unsealing. |
| 357-4 | Adopt same ruling as DE 316-4 from second round of unsealing. |
| 357-5 | Adopt same ruling as DE 316-5 from second round of unsealing. |
| 357-6 | Adopt same ruling as DE 316-6 from second round of unsealing. |
| 357-7 | Adopt same ruling as DE 316-7 from second round of unsealing. |
| 357-8 | Adopt same ruling as DE 316-8 from second round of unsealing. |
| 367 | Adopt same ruling as DE 316 from second round of unsealing. |
| 367-1 | Adopt same ruling as DE 316-1 from second round of unsealing. |
| 367-2 | Adopt same ruling as DE 316-2 from second round of unsealing. |
| 367-3 | Adopt same ruling as DE 316-3 from second round of unsealing. |
| 367-4 | Adopt same ruling as DE 316-4 from second round of unsealing. |
| 367-5 | Adopt same ruling as DE 316-5 from second round of unsealing. |
| 367-6 | Adopt same ruling as DE 316-6 from second round of unsealing. |

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| 367-7 | Adopt same ruling as DE 316-7 from second round of unsealing. |
| 367-8 | Adopt same ruling as DE 316-8 from second round of unsealing. |
| 368 | Ruled on in second round of unsealing. |
| 369 | Ruled on in second round of unsealing. |
| 369-1 | Ruled on in second round of unsealing. |
| 369-2 | Ruled on in second round of unsealing. |
| 369-3 | Ruled on in second round of unsealing. |
| 369-4 | Ruled on in second round of unsealing. |
| 369-5 | Ruled on in second round of unsealing. |
| 369-6 | Ruled on in second round of unsealing. |
| 369-7 | Ruled on in second round of unsealing. |
| 369-8 | Ruled on in second round of unsealing. |
| 369-9 | Ruled on in second round of unsealing. |
| 369-10 | Ruled on in second round of unsealing. |
| 369-11 | Ruled on in second round of unsealing. |
| 369-12 | Ruled on in second round of unsealing. |
| 369-13 | Ruled on in second round of unsealing. |
| 369-14 | Ruled on in second round of unsealing. |
| 369-15 | Ruled on in second round of unsealing. |
| 369-16 | Ruled on in second round of unsealing. |
| 362: Alan Dershowitz Motion to Intervene or Modify Protective | Already public. |
| 363 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 363-1 | Unseal with Second Circuit redactions. |
| 363-2 | Unseal with Second Circuit redactions. |
| 363-7 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Unseal portions released by Second Circuit. |

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| 363-13 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 364 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 382 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 406 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 407 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 407-1 | Unseal in full. |
| 407-2 | Unsealed by Second Circuit. Note: Original parties agree. |
| 407-3 | Unseal in full. |
| 407-4 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 407-5 | Unseal in full. |
| 407-6 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The Original Parties sent the Non-Party deponent (Doe 1) notice of unsealing, the Non-Party deponent requested excerpts, and the Non-Party deponent did not object to unsealing within two weeks of receiving the excerpts. Portion released by Second Circuit. |
| 407-7 | Unseal in full. |
| 407-8 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: Doe is deceased. |
| 407-9 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. The Original Parties sent the Non-Party deponents (Does 99, 122, & 136) notice of unsealing, and the Non-Party deponents did not request excerpts. |
| 407-10 | Unseal article. For deposition, unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The deponent is not on the Non-Party notification list because he is a law enforcement officer. |

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| 407-11 | Unseal in full. |
| 407-12 | Unseal in full. |
| 407-13 | Unseal in full. Note: Original parties agree. |
| 407-14 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 407-15 | Unseal in full. |
| 407-16 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 407-17 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 407-18 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 407-19 | Publicly available at DE 136. |
| 407-20 | Unseal in full. |
| 407-21 | Unseal in full. |
| 407-22 | Unseal in full. |
| 407-23 | Unseal in full. |
| 408 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 408-1 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 408-2 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 408-3 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 408-4 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 435 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 435-1 | Already public. |
| 435-2 | Already public. |

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| 435-3 | Already public. |
| 435-4 | Already public. |
| 435-5 | Already public. |
| 435-6 | Already public. |
| 435-7 | Already public. |
| 435-8 | Already public. |
| 435-9 | Already public. |
| 435-10 | Already public. |
| 436 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 444 | Already public. |
| 447 | Unseal in full. |
| 370: Defendant's Motion for Protective Order regarding Financial Information | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 371 | Unseal in full. |
| 371-3 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 388 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 389 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 389-1 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The Original Parties sent the Non-Party deponent (Doe 160) excerpts, and the Non-Party deponent did not submit an objection. |
| 389-2 | Keep sealed pending resolution of Doe 151's objection. |

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| 389-3 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The Original Parties sent the Non-Party deponent (Doe 1) notice of unsealing, the Non-Party deponent requested excerpts, and the Non-Party deponent did not object to unsealing within two weeks of receiving the excerpts. The Second Circuit released this material. |
| 389-4 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The Original Parties sent the Non-Party deponent (Doe 67) notice of unsealing, and the Non-Party deponent did not request excerpts. The Second Circuit released this material. |
| 389-5 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The deponent is not on the Non-Party notification list because he is a law enforcement officer. The Second Circuit released this material. |
| 389-6 | Unsealed by Second Circuit. Note: Original parties agree. |
| 389-7 | This deposition transcript was unsealed on October 22, 2020, DE 1137-13. This document should be redacted in the same way as DE 1137-13, but the redactions of the names of Non-Parties whose time to object has expired should be removed. |
| 389-8 | Unseal in full. |
| 389-9 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 404 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 405 | Unseal in full. Note: Original parties agree. |
| 405-1 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Redact phone numbers and email addresses. |
| 422: Defendant's Motion to Compel Settlement Agreement | Already public. |
| 423 | Already public. |
| 423-1 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Additionally, redact all phone numbers, email addresses, and personal addresses. |

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| 423-2 | Unseal in full. Note: Original parties agree. |
| 423-3 | Already public. |
| 423-4 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Additionally, redact all phone numbers, email addresses, and personal addresses. |
| 437 | Already public. |
| 468: Motion to Compel Ghislaine Maxwell to Produce Data from Undisclosed Email Account and for an Adverse Inference Instruction | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 469 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 469-1 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The Original Parties sent the Non-Party deponent (Doe 1) notice of unsealing, the Non-Party deponent requested excerpts, and the Non-Party deponent did not object to unsealing within two weeks of receiving the excerpts. |
| 469-2 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. The Original Parties sent the Non-Party deponent (Doe 7) notice of unsealing, and the Non-Party deponent did not request excerpts. |
| 469-3 | This deposition transcript was unsealed on October 22, 2020, DE 1137-13. This document should be redacted in the same way as DE 1137-13, but the redactions of the names of Non-Parties whose time to object has expired should be removed. |
| 479 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 480 | Unseal in full. Note: Original parties agree. |
| 480-1 | Unseal but redact email addresses. |
| 480-2 | Unseal but redact email addresses. |
| 480-3 | This deposition transcript was unsealed on October 22, 2020, DE 1137-13. This document should be redacted in the same way as DE 1137-13, but the redactions of the names of Non-Parties whose time to object has expired should be removed. |
| 480-4 | Unsealed by Second Circuit. Note: Original parties agree. |

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| 490 | Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. |
| 491 | Unseal in full. Note: Original parties agree. |
| 491-1 | Already public. |
| 491-2 | Unseal in full. Note: Original parties agree. |
| 491-3 | Unseal but redact email addresses. |
| 491-4 | Unseal but redact email addresses. |
| 640: [Redacted] Motion for Protective Order | Keep sealed pending resolution of Doe 147's objections. |
| 641 | Keep sealed pending resolution of Doe 147's objections. |
| 641-1 | Keep sealed pending resolution of Doe 147's objections. |
| 641-2 | Keep sealed pending resolution of Doe 147's objections. |
| 655 | Keep sealed pending resolution of Doe 147's objections. |
| 656 | Keep sealed pending resolution of Doe 147's objections. |
| 656-1 | Keep sealed pending resolution of Doe 147's objections. |
| 656-2 | Keep sealed pending resolution of Doe 147's objections. |
| 656-3 | Keep sealed pending resolution of Doe 147's objections. |
| 656-4 | Keep sealed pending resolution of Doe 147's objections. |
| 656-5 | Keep sealed pending resolution of Doe 147's objections. |
| 656-6 | Keep sealed pending resolution of Doe 147's objections. |
| 656-7 | Keep sealed pending resolution of Doe 147's objections. |
| 656-8 | Keep sealed pending resolution of Doe 147's objections. |
| 656-9 | Keep sealed pending resolution of Doe 147's objections. |
| 700 | Keep sealed pending resolution of Doe 147's objections. |
| 701 | Keep sealed pending resolution of Doe 147's objections. |
| 701-1 | Keep sealed pending resolution of Doe 147's objections. |
| 701-2 | Keep sealed pending resolution of Doe 147's objections. |
| 707 | Keep sealed pending resolution of Doe 147's objections. |
| 709 | Keep sealed pending resolution of Doe 147's objections. |
| 714 | Keep sealed pending resolution of Doe 147's objections. |

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| 715 | Keep sealed pending resolution of Doe 147's objections. |
| 715-1 | Keep sealed pending resolution of Doe 147's objections. |
| 715-2 | Keep sealed pending resolution of Doe 147's objections. |