

EXHIBIT A

BOIES, SCHILLER & FLEXNER LLP

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May 17, 2016

VIA E-MAIL

Laura A. Menninger, Esq.
Jeffrey Pagliuca, ESQ.
HADDON, MORGAN AND FOREMAN, P.C.
150 East 10th Avenue
Denver, Colorado 80203

Re: *Giuffre v. Maxwell*
Case No. 15-cv-07433-RWS

Dear Counsel:

I am writing to follow-up regarding your questions concerning Ms. Giuffre's email accounts.

Regarding her live.com address, it appears that the account has been permanently deleted by the host Company. One method of telling if an account still exists for live.com (and for most web mail systems) is to perform an account password recovery. When you enter the e-mail address and enter the captca code and hit Next, the website states that it does not recognize the email address. This means that the account has been permanently deleted from live.com's system. Please see the below image and explanation of the process Microsoft follows:



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It appears that Microsoft has a policy of deleting accounts after periods of inactivity. For example, see https://www.oaic.gov.au/resources/media-and-speeches/statements/changes-to-the-microsoft-service-agreement/121217_letter_from_microsoft.pdf. However, I cannot make a representation as to Microsoft's handling of Ms. Giuffre's account.

Regarding the Hotmail.com address, Ms. Giuffre has attempted to recover her password by submitting personal information to the Hotmail.com website, but her multiple attempts have been unsuccessful.

Finally, regarding the icloud.com account, we are in the process of finding out details on this account. At this point, it appears that it was created for support of an apple phone. We are in the process of establishing whether or not Ms. Giuffre has access to this account, and will update you when we have more information.

Sincerely,

A handwritten signature in cursive script, appearing to read "Meredith Schultz".

Meredith Schultz

MS/ep