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BOIES, SCHILLER & FLEXNER LLP

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Meredith Schultz, Esq. E-mail: mschultz@bsfllp.com

September 23, 2016

VIA E-MAIL

Laura A. Menninger, Esq.
HADDON, MORGAN AND FOREMAN, P.C.
150 East 10th Avenue
Denver, Colorado 80203
lmenninger@hmlaw.com

Re: Giuffre v. Maxwell

Case No. 15-cv-07433-RWS

Dear Laura,

The earliest-dated email communication Defendant produced was from July 18, 2009. Accordingly, there is a 10 year gap in email data from your production (from 1999-2009). You have represented that Defendant used neither the account nor the to communicate (email addresses that were taken by police from Epstein's home in 2005). If this is correct, logic dictates that Defendant used a different email account to communicate from 1999-2009. Defendant has not indicated what email account she used from 1999-2009 to communicate. Therefore, I am writing to ask what email account Defendant used to communicate from 1999-2009, since she claims that the accounts listed with her contact information from the police collection were not used to communicate.

Sincerely,

Meredith Schultz

Mercel Schulykay