

EXHIBIT 2
(FILE UNDER SEAL)

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June 13, 2016

Via CM/ECF

Laura A. Menninger, Esq.
Haddon, Morgan and Foreman, P.C.
150 East 10th Ave.
Denver, CO 80203

Re: *Giuffre v. Maxwell*
Case no. 15-cv-07433-RWS – Regarding Certificates of Service

Dear Laura,

I have lawfully served the witnesses in this case, and have undertaken great effort to serve [REDACTED]. An affidavit from the process server engaged in that effort documenting such efforts was served upon you and filed with this Court. I'm familiar with Rule 45, and there is no requirement that certificates of service be served upon opposing counsel. Notice is all that is required under the Rules. You, yourself, have not served such certificates of service in this case. I completely reject your arbitrary statement that "[f]ailure to provide them . . . will be understood as an acknowledgement that you have not, in fact, undertaken the good faith efforts." We have said we did. I acknowledge no such thing, and such a statement is nonsense.

In recognition of your request, I am in the process of gathering the certificates of service. I will serve them on you, merely as a courtesy, as I collect them. Please likewise provide all certificates of services for the witnesses you have noticed.

While we are on the topic of absences of responses, you did not respond to my June 8, 2016, letter requesting a meet and confer call. Therefore, I write again to schedule a meet-and-confer call regarding your grossly deficient production and improper objections in response to Plaintiff's Second Request for Production. I am available for a meet and confer call on this matter any time tomorrow and Wednesday, June 15, 2016, from 10:00 AM EST to 4:00 PM EST. Please advise, by tomorrow, what time such a call works for your schedule.

Thanks,



Meredith Schultz