| Case 1:15-cv-07433-LAP Docu | <u>ıment 1326-3</u> | Filed 01/04/24 | Page 1 of 27 |  |
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| ID  | Email Sent Date | Email From            | Email To  | CC Address           | Subject Matter   | Type of Privilege  | Action    | Page Count | Туре |
| 1   | 2/12/2015 6:14  | Virginia Giuffre      | smccawley@bsfllp.com  |                      | Email chain with Giuffre, Edwards and Cassell re attorney impressions and legal advice relating to deposition testimony  |  | Withheld  | 3          | msg  |
| 2   | 2/16/2015 1:05  | StanPottinger@aol.com | Smccawley@BSFLLP.com,br<br>ad@pathtojustice.com,robie                       |                      | Discussion of evidence among client and attorneys  | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 2          | msg  |
| 3   | 2/16/2015 15:37 | Virginia Giuffre      | Smccawley@BSFLLP.com  |                      | Email chain with Giuffre, McCawley, Pottinger and Edwards re<br>information provided by client to assist in legal advice | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product  | Withheld  | 2          | msg  |
| 4   | 2/16/2015 16:15 | Sigrid McCawley       |   |                      | Email chain with Giuffre, McCawley, Pottinger and Edwards re information provided by client to assist in legal advice    | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product  | Withheld  | 2          | msg  |
| 5   | 2/16/2015 16:24 | Virginia Giuffre      | Smccawley@BSFLLP.com  |                      | Email chain with Giuffre, McCawley, Pottinger and Edwards re information provided by client to assist in legal advice    | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product  | Withheld  | 2          | msg  |
| 6   | 2/16/2015 16:24 | Sigrid McCawley       |   |                      | Email chain with Giuffre, McCawley, Pottinger and Edwards re information provided by client to assist in legal advice    | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product  | Withheld  | 2          | msg  |
| 7   | 2/21/2015 16:45 | Sigrid McCawley       | StanPottinger@aol.com,bra<br>d@pathtojustice.com,cassell<br>p@law.utah.edu, | Smccawley@BSFLLP.com | Discussion of evidence among client and attorneys  | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 2          | msg  |

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| ID  | Email Sent Date | Email From            | Email To             | <u>CC Address</u>  | Subject Matter                                      | Type of Privilege AC Privilege and Work Product/joint defense/commo      | Action    | Page Count | Type |
| 8   | 2/21/2015 16:58 | Virginia Giuffre      | Smccawley@BSFLLP.com |  | Discussion of evidence among client and attorney    | n interest   | Withheld  | 2          | msg  |
| 9   | 2/21/2015 17:05 | Brad Edwards          |                      | StanPottinger@aol.com,cassellp@l<br>aw.utah.edu,                           | Discussion of evidence among client and attorneys   | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 2          | msg  |
|     |                 | Sigrid McCawley       |                      |  | Discussion of evidence among client and attorney    | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  |            |      |
| 10  | 2/21/2015 17:10 | Sigrid McCawley       |                      |  | Discussion of evidence among client and attorney    | <del> </del>   | Withheld  | 3          | msg  |
| 11  | 2/21/2015 17:16 | Virginia Giuffre      | Smccawley@BSFLLP.com |  | Discussion of evidence among client and attorneys   | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 3          | msg  |
| 12  | 2/23/2015 14:21 | Sigrid McCawley       |                      | StanPottinger@aol.com,brad@pat<br>htojustice.com,cassellp@law.utah.<br>edu | Discussion of thoughts and impressions of attorneys | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 1          | msg  |
| 13  | 2/23/2015 14:29 | StanPottinger@aol.com |                      | brad@pathtojustice.com,cassellp@<br>law.utah.edu                           | Discussion of thoughts and impressions of attorneys | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 1          | msg  |
| 14  | 2/23/2015 16:01 | Virginia Giuffre      |                      | StanPottinger@aol.com,brad@pat<br>htojustice.com,cassellp@law.utah.<br>edu | Discussion of thoughts and impressions of attorneys | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 1          | msg  |

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| ID  | Email Sent Date | Email From       | Email To              | CC Address                                      | Subject Matter   | Type of Privilege  | Action    | Page Count | Type |
| 15  | 2/24/2015 17:51 | Sigrid McCawley  |                       |   | Email chain with McCawley, Giuffre, and Paralegals re seeking information to assist in legal advice, with attachment | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 4          | msg  |
| 16  |                 |                  |                       |   | Attached case research   | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 14         | rtf  |
| 17  | 2/26/2015 12:59 | Virginia Giuffre | Smccawley@BSFLLP.com  |   | Email chain with Giuffre, McCawley and legal assistant re legal document, with attachment                            | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 1          | msg  |
| 18  |                 |                  |                       |   | Attached draft legal document  | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 1          | jfif |
| 19  | 2/28/2015 17:47 | Virginia Giuffre | Smccawley@BSFLLP.com  |   | Email with Giuffre, McCawley, Edwards and Henderson re discussion of draft statement                                 | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 3          | msg  |
| 20  | 3/13/2015 17:29 | Stan Pottinger   |                       | Smccawley@BSFLLP.com,brad@pa<br>thtojustice.com | Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues                 | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 2          | msg  |
| 21  | 3/13/2015 17:49 | Virginia Giuffre | stanpottinger@aol.com |   | Email chain with Giuffre, Edwards, McCawley and Pottinger re legal advice on media issues                            | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 2          | msg  |

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| ID  | Email Sent Date | Email From            | Email To               | CC Address                                      | Subject Matter   | Type of Privilege  | Action    | Page Count | Type |
| 22  | 3/13/2015 17:56 | StanPottinger@aol.com |                        | Smccawley@BSFLLP.com,brad@pa<br>thtojustice.com | Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 3          | msg  |
| 23  | 3/13/2015 18:00 | Brad Edwards          | StanPottinger@aol.com, | Smccawley@BSFLLP.com                            | Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 3          | msg  |
| 24  | 3/13/2015 18:24 | Virginia Giuffre      | brad@pathtojustice.com |   | Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 4          | msg  |
| 25  | 3/13/2015 18:25 | Virginia Giuffre      | StanPottinger@aol.com  |   | Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 3          | msg  |
| 26  | 3/13/2015 21:53 | Virginia Giuffre      | brad@pathtojustice.com | Smccawley@BSFLLP.com,StanPotti                  | Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 4          | msg  |
| 27  | 3/13/2015 23:38 | Brad Edwards          |                        |   | Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 4          | msg  |
| 28  | 3/13/2015 23:40 | Virginia Giuffre      | brad@pathtojustice.com |   | Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 4          | msg  |

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| ID  | Email Sent Date | Email From       | Email To  | CC Address                                       | Subject Matter  | Type of Privilege   | Action    | Page Count | Type |
| 29  | 3/17/2015 15:20 | Virginia Giuffre | Smccawley@BSFLLP.com,br<br>ad@pathtojustice.com,stan<br>pottinger@aol.com |  | Providing information to assist in legal advice re potential legal action, with attachments                       | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product | Withheld  | 1          | msg  |
| 30  | 3/17/2015 18:40 | Stan             | Smccawley@BSFLLP.com,br<br>ad@pathtojustice.com                           |  | Email chain with Giuffre, Edwards, Pottinger and McCawley re<br>legal advice related to VRS                       | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product | Withheld  | 1          | msg  |
| 31  | 3/17/2015 19:42 | Virginia Giuffre | stanpottinger@aol.com   |  | Email chain with Giuffre, Edwards, Pottinger and McCawley re legal advice related to VRS                          | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product | Withheld  | 1          | msg  |
| 32  | 3/20/2015 15:43 | Sigrid McCawley  |   | aortiz@BSFLLP.com,brittany@path<br>tojustice.com | Email chain with Giuffre, Edwards, Henderson, Pottinger,<br>McCawley and BSF staff re legal advice related to VRS | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product | Withheld  | 1          | msg  |
| 33  | 3/20/2015 15:57 | Sigrid McCawley  |   |  | Providing legal advice re potential deposition  | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product | Withheld  | 1          | msg  |
| 34  | 3/24/2015 21:19 | Sigrid McCawley  |   | aortiz@BSFLLP.com                                | Email chain with Giuffre, Edwards, Henderson, McCawley and<br>BSF staff re legal advice related to VRS            | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product | Withheld  | 2          | msg  |

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| ID  | Email Sent Date | Email From       | Email To              | CC Address   | Subject Matter  | Type of Privilege   | Action    | Page Count | Type |
| 35  | 3/24/2015 21:21 | Virginia Giuffre | Smccawley@BSFLLP.com  | aortiz@BSFLLP.com  | Email chain with Giuffre, Edwards, Henderson, McCawley and<br>BSF staff re legal advice related to VRS            | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product | Withheld  | 2          | msg  |
| 36  | 3/24/2015 21:36 | Andres Ortiz     | Smccawley@BSFLLP.com, |  | Email chain with Giuffre, Edwards, Henderson, McCawley and<br>BSF staff re legal advice related to VRS            | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product | Withheld  | 2          | msg  |
| 37  | 3/24/2015 22:21 | Virginia Giuffre | aortiz@BSFLLP.com     |  | Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS               | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product | Withheld  | 3          | msg  |
| 38  | 3/26/2015 2:00  | Sigrid McCawley  |                       | Smccawley@BSFLLP.com,StanPotti<br>nger@aol.com,brad@pathtojustice<br>.com,brittany@pathtojustice.com,e<br>perez@BSFLLP.com | Email chain with Giuffre, Edwards, Henderson, Pottinger,<br>McCawley and BSF staff re legal advice related to VRS | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product | Withheld  | 1          | msg  |
| 39  | 3/26/2015 2:21  | Virginia Giuffre | Smccawley@BSFLLP.com  |  | Email chain with Giuffre, Edwards, Henderson, McCawley and<br>BSF staff re legal advice related to VRS            | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product | Withheld  | 2          | msg  |
| 40  | 3/26/2015 2:22  | Sigrid McCawley  |                       |  | Email chain with Giuffre, Edwards, Henderson, McCawley and<br>BSF staff re legal advice related to VRS            | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product | Withheld  | 2          | msg  |

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| ID  | Email Sent Date | Email From         | Email To             | CC Address                                   | Subject Matter   | Type of Privilege  | Action    | Page Count | Type |
| 41  | 3/26/2015 3:00  | Virginia Giuffre   | Smccawley@BSFLLP.com |  | Email chain with Giuffre, Edwards, Henderson, McCawley and<br>BSF staff re legal advice related to VRS | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product  | Withheld  | 2          | msg  |
| 42  | 4/1/2015 21:32  | Virginia Giuffre   | Smccawley@BSFLLP.com |  | Giuffre conveying information sought by attorney to assist in legal advice with attachments            | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product  | Withheld  | 1          | msg  |
| 43  | 4/2/2015 7:01   | Brittany Henderson |                      | eperez@BSFLLP.com                            | Providing draft legal document for client review, with attachment                                      | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product  | Withheld  | 1          | msg  |
| 44  |                 |                    |                      |  | Attached Draft legal document  | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 15         | pdf  |
| 45  | 4/3/2015 15:32  | Brittany Henderson |                      | brad@pathtojustice.com,eperez@<br>BSFLLP.com | Email chain with Giuffre, Henderson, Edwards and legal assistant re legal document, with attachment    | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 2          | msg  |
| 46  |                 |                    |                      |  | Attached draft legal document  | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest |           | 15         | pdf  |

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| ID  | Email Sent Date | Email From       | Email To             | CC Address   | Subject Matter   | Type of Privilege  | Action    | Page Count | Type |
| 47  | 4/8/2015 20:34  | Virginia Giuffre | Smccawley@BSFLLP.com |  | Seeking legal advice related to VRS  | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product  | Withheld  | 1          | msg  |
| 48  | 4/9/2015 3:23   | Virginia Giuffre | Smccawley@BSFLLP.com |  | Email chain with Giuffre and McCawley re advice re legal filings, with attachments                   | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product  | Withheld  | 2          | msg  |
| 49  | 4/9/2015 7:16   | Sigrid McCawley  |                      | brittany@pathtojustice.com,sperki<br>ns@BSFLLP.com | Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice re media issues | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product  | Withheld  | 2          | msg  |
| 50  | 4/9/2015 9:26   | Brad Edwards     | Smccawley@BSFLLP.com |  | Email chain with Giuffre, Edwards, and McCawley re legal advice re media issues                      |  | Withheld  | 1          | msg  |
| 51  | 4/9/2015 9:33   | Sigrid McCawley  |                      |  | Email chain with Giuffre and McCawley re legal advice re media issues                                | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product  | Withheld  | 2          | msg  |
| 52  | 4/9/2015 12:46  | Sigrid McCawley  |                      |  | Conveying legal advice re draft legal documents to client, with attachments                          | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 1          | msg  |

| Log |                 |                  |                      |   |   |  | Privilege |            | Doc  |
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| ID  | Email Sent Date | Email From       | Email To             | CC Address  | Subject Matter  | Type of Privilege  | Action    | Page Count | Type |
| 53  |                 |                  |                      |   | Conveying legal advice re draft legal documents to client, with attachments | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 14         | docx |
| 54  |                 |                  |                      |   | Conveying legal advice re draft legal documents to client, with attachments | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 12         | docx |
| 55  |                 |                  |                      |   | Conveying legal advice re draft legal documents to client, with attachments | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 2          | docx |
| 56  | 4/10/2015 14:59 | Sigrid McCawley  |                      | StanPottinger@aol.com,brad@pat<br>htojustice.com  | Providing legal advice re media issues                                      | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product  | Withheld  | 1          | msg  |
| 57  | 4/10/2015 15:37 | Virginia Giuffre | Smccawley@BSFLLP.com |   | Regarding legal advice re media issues                                      | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product  | Withheld  | 1          | msg  |
| 58  | 4/10/2015 17:31 | Sigrid McCawley  |                      | StanPottinger@aol.com,brad@pat<br>htojustice.com,brittany@pathtojus<br>tice.com,eperez@BSFLLP.com |   | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 2          | msg  |
| 59  |                 |                  |                      |   | Attached draft legal document   | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 3          | pdf  |

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| ID   | Email Sent Date | Email From       | Email To                   | CC Address | Subject Matter   | Type of Privilege              | Action                                | Page Count | Type  |
|      |                 |                  |                            |            |  | AC Privilege and               |                                       |            |       |
|      |                 |                  |                            |            |  | Work                           |                                       |            |       |
|      |                 |                  |                            |            |  | Product/joint<br>defense/commo |                                       |            |       |
| 60   |                 |                  |                            |            | Attached draft legal document                                    | n interest                     | Withheld                              | 21         | - df  |
| 60   |                 |                  |                            |            | Attached draft legal document                                    | minterest                      | withheld                              | 21         | pdf   |
|      |                 |                  |                            |            |  |                                |                                       |            |       |
|      |                 |                  |                            |            |  | Attorney<br>Client/joint       |                                       |            |       |
|      |                 |                  |                            |            |  | defense/commo                  |                                       |            |       |
|      |                 |                  |                            |            | Email chain with Giuffre, McCawley and BSF staff regarding legal | · ·                            |                                       |            |       |
| 61   | 4/10/2015 17:40 | Virginia Giuffre | Smccawley@BSFLLP.com       |            | advice related to VRS  | product                        | Withheld                              | 2          | msg   |
| - 01 | 1/10/2015 17:10 | Virginia Giarric | Sincounicy@ SSI 221 100111 |            | davice related to the  | product                        | · · · · · · · · · · · · · · · · · · · | -          | IIIJg |
|      |                 |                  |                            |            |  | Attorney                       |                                       |            |       |
|      |                 |                  |                            |            |  | Client/joint                   |                                       |            |       |
|      |                 |                  |                            |            |  | defense/commo                  |                                       |            |       |
|      |                 |                  |                            |            | Email chain with Giuffre, McCawley and BSF staff regarding legal |                                |                                       |            |       |
| 62   | 4/10/2015 19:10 | Virginia Giuffre | Smccawley@BSFLLP.com       |            | advice related to VRS  |                                | Withheld                              | 2          | msg   |
|      |                 | _                | ·                          |            |  | -                              |                                       |            |       |
|      |                 |                  |                            |            |  | Attorney                       |                                       |            |       |
|      |                 |                  |                            |            |  | Client/joint                   |                                       |            |       |
|      |                 |                  |                            |            |  | defense/commo                  |                                       |            |       |
|      |                 |                  |                            |            | Email chain with Giuffre, McCawley and BSF staff regarding legal | n interest/work                |                                       |            |       |
| 63   | 4/10/2015 19:28 | Sigrid McCawley  |                            |            | advice related to VRS  | product                        | Withheld                              | 2          | msg   |
|      |                 |                  |                            |            |  |                                |                                       |            |       |
|      |                 |                  |                            |            |  | Attorney                       |                                       |            |       |
|      |                 |                  |                            |            |  | Client/joint                   |                                       |            |       |
|      |                 |                  |                            |            |  | defense/commo                  |                                       |            |       |
|      |                 |                  |                            |            | Email chain with Giuffre, McCawley and BSF staff regarding legal |                                |                                       |            | 1     |
| 64   | 4/10/2015 19:33 | Virginia Giuffre | Smccawley@BSFLLP.com       |            | advice related to VRS  | product                        | Withheld                              | 2          | msg   |
|      |                 |                  |                            |            |  |                                |                                       |            |       |
|      |                 |                  |                            |            |  | Attorney                       |                                       |            | 1     |
|      |                 |                  |                            |            |  | Client/joint                   |                                       |            | 1     |
|      |                 |                  |                            |            |  | defense/commo                  |                                       |            |       |
|      |                 |                  |                            |            | Email chain with Giuffre, McCawley and BSF staff regarding legal |                                |                                       |            |       |
| 65   | 4/10/2015 20:03 | Sigrid McCawley  |                            |            | advice related to VRS  | product                        | Withheld                              | 2          | msg   |

| Log |                 |                  |   |  |  |  | Privilege |            | Doc  |
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| ID  | Email Sent Date | Email From       | Email To  | CC Address                                       | Subject Matter   | Type of Privilege  | Action    | Page Count | Type |
| 66  | 4/10/2015 20:04 | Virginia Giuffre | Smccawley@BSFLLP.com  |  | Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS   |  | Withheld  | 2          | msg  |
| 67  | 4/10/2015 20:04 | Sigrid McCawley  |   |  | Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS   |  | Withheld  | 2          | msg  |
| 68  | 4/10/2015 23:46 | Virginia Giuffre | Smccawley@BSFLLP.com  |  | Email chain with Giuffre, McCawley legal assistant re seeking and providing information sought by attorney to assist in providing legal advice, with attachments | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 3          | msg  |
| 69  | 4/13/2015 13:52 | Sigrid McCawley  |   | StanPottinger@aol.com,brad@pat<br>htojustice.com | Email chain with Giuffre, Pottinger, Edwards and McCawley re legal advice regarding potential public statements  | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 3          | msg  |
| 70  |                 | Virginia Giuffre | Smccawley@BSFLLP.com  |  | Email chain with Giuffre, Pottinger, Edwards and McCawley re legal advice regarding media issues   | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 3          | msg  |
| 71  | 4/14/2015 23:38 | Brad Edwards     | Smccawley@BSFLLP.com,bri<br>ttany@pathtojustice.com,<br>stan<br>pottinger@aol.com |  | Providing legal advice related to VRS  | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product  | Withheld  | 1          | msg  |

| Log |                 |                  |                      |                      |  |   | Privilege |            | Doc  |
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| ID  | Email Sent Date | Email From       | Email To             | CC Address           | Subject Matter   | Type of Privilege   | Action    | Page Count | Type |
| 72  | 4/16/2015 11:14 | Virginia Giuffre | Smccawley@BSFLLP.com |                      | Email chain with Giuffre and McCawley re legal advice regarding media issues         | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product | Withheld  | 2          | msg  |
| 73  | 4/16/2015 11:47 | Sigrid McCawley  |                      |                      | Email chain with Giuffre and McCawley re legal advice regarding media issues         | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product | Withheld  | 2          | msg  |
| 74  | 4/24/2015 19:22 | Sigrid McCawley  |                      |                      | Providing legal advice re records retention, with attachments                        | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product | Withheld  | 1          | msg  |
| 75  |                 |                  |                      |                      | Attached letter providing legal advice re document retention                         | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product | Withheld  | 2          | pdf  |
| 76  | 4/24/2015 19:59 | Virginia Giuffre | Smccawley@BSFLLP.com |                      | Email chain with Giuffre and McCawley re legal advice regarding potential deposition | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product | Withheld  | 1          | msg  |
| 77  | 4/27/2015 21:20 | Brad Edwards     |                      | Smccawley@BSFLLP.com | Seeking information to assist in providing legal advice                              | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product | Withheld  | 1          | msg  |

| Log |                 |                    |                            |  |  |  | Privilege |            | Doc  |
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| ID  | Email Sent Date | Email From         | Email To                   | CC Address                                   | Subject Matter   | 7,1  | Action    | Page Count | Type |
| 78  | 4/30/2015 6:42  | Brittany Henderson |                            | Smccawley@BSFLLP.com,brad@pathtojustice.com, | Legal documents provided to assist in providing legal advice   | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 1          | msg  |
| 79  | 4/30/2015 7:02  | Brittany Henderson |                            |  | Email chain with Giuffre, Henderson and paralegal re seeking and providing information to assist in providing legal advice   | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product  | Withheld  | 2          | msg  |
| 80  | 4/30/2015 7:05  | Virginia Giuffre   | brittany@pathtojustice.com |  | Email chain with Giuffre, Henderson, Edwards, McCawley and<br>legal assistant re seeking information to assist in providing legal<br>advice                            | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 2          | msg  |
| 81  | 5/4/2015 20:04  | Virginia Giuffre   | brittany@pathtojustice.com |  | Email chain with Giuffre, Henderson, Edwards, McCawley and<br>legal assistant re seeking information to assist in providing legal<br>advice, with attachment           | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 2          | msg  |
| 82  | 5/11/2015 18:20 | Sigrid McCawley    |                            | Smccawley@BSFLLP.com                         | Email chain with McCawley, Giuffre, Edwards, Pottinger,<br>Henderson and Paralegal re seeking and providing information<br>to assist in legal advice, with attachments | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 1          | msg  |
| 83  | 5/11/2015 18:34 | Virginia Giuffre   | Smccawley@BSFLLP.com       |  | Email chain with Giuffre, McCawley, Edwards, Pottinger and<br>Paralegal re seeking information to assist in providing legal<br>advice re potential litigation          | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 2          | msg  |
| 84  | 5/11/2015 18:40 | Sigrid McCawley    |                            |  | Email chain with Giuffre and McCawley re case research, with attachment  | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 2          | msg  |

| Log   |                                    |                            |                                   |            |   |  | Privilege |            | Doc  |
|-------|------------------------------------|----------------------------|-----------------------------------|------------|---|--|-----------|------------|------|
| ID 85 | Email Sent Date<br>5/11/2015 18:45 | Email From Sigrid McCawley | Email To  brad@pathtojustice.com, | CC Address | Subject Matter  Providing and seeking information to assist in legal advice re potential legal action, with attachment  | Type of Privilege AC Privilege and Work Product/joint defense/commo n interest | Withheld  | Page Count | Type |
| 86    | 5/11/2015 18:47                    | Virginia Giuffre           | Smccawley@BSFLLP.com              |            | Email chain with Giuffre and McCawley re seeking information to assist in providing legal advice re potential litigation                                      | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product        | Withheld  | 1          | msg  |
| 87    | 5/11/2015 18:56                    | Virginia Giuffre           | brad@pathtojustice.com            |            | Email chain with Giuffre, McCawley, Edwards, Pottinger and<br>Paralegal re seeking information to assist in providing legal<br>advice re potential litigation | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest       | Withheld  | 2          | msg  |
| 88    | 5/17/2015 22:37                    | Sigrid McCawley            |                                   |            | Providing litigation documents to client, with attachments  | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product        | Withheld  | 3          | msg  |
| 89    |                                    |                            |                                   |            | Attached draft legal agreement  | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest       | Withheld  | 10         | pdf  |
| 90    | 5/17/2015 22:40                    | Sigrid McCawley            |                                   |            | Providing legal advice re legal agreement, with attachment  | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product        | Withheld  | 1          | msg  |
| 91    | 5/18/2015 18:40                    | Virginia Giuffre           | Smccawley@BSFLLP.com              |            | Discussion of confidential agreement, with attachments  | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest       | Withheld  | 1          | msg  |

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| ID  | Email Sent Date | Email From       | Email To             | CC Address        | Subject Matter  | Type of Privilege   | Action    | Page Count | Type |
| 92  |                 |                  |                      |                   | Attached confidential agreement page  | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product | Withheld  | 1          | jfif |
| 93  |                 |                  |                      |                   | Attached confidential agreement page  | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product | Withheld  | 1          | jfif |
| 94  | 6/5/2015 19:16  | Sigrid McCawley  |                      |                   | Conveying attorney mental impression regarding hearing                                | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product | Withheld  | 1          | msg  |
| 95  | 6/6/2015 17:20  | Virginia Giuffre | Smccawley@BSFLLP.com |                   | Email chain with Giuffre and McCawley re attorney mental impression regarding hearing | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product | Withheld  | 1          | msg  |
| 96  | 6/25/2015 2:26  | Sigrid McCawley  |                      |                   | Providing advice re status and strategy of ongoing legal matters                      | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product | Withheld  | 6          | msg  |
| 97  | 7/17/2015 14:19 | Sigrid McCawley  |                      | eperez@BSFLLP.com | Discussion with S. McCawley regarding file related to representation by B. Josefsberg | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product | Withheld  | 4          | msg  |

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| ID  | Email Sent Date | Email From       | Email To             | CC Address                                      | Subject Matter   | Type of Privilege  | Action    | Page Count | Type |
| 98  | 7/27/2015 21:53 | Virginia Giuffre | Smccawley@BSFLLP.com |   | Providing information to assist in legal advice re potential litigation  | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product  | Withheld  | 1          | msg  |
| 99  | 7/29/2015 19:45 | Sigrid McCawley  |                      | StanPottinger@aol.com                           | Conveying legal advice on media issues   | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product  | Withheld  | 1          | msg  |
| 100 | 8/5/2015 19:51  | Sigrid McCawley  |                      |   | Email chain with Giuffre, McCawley and paralegals re information sought to assist in providing legal advice  | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 1          | msg  |
| 101 | 8/6/2015 2:14   | Sigrid McCawley  |                      |   | Email chain with Giuffre, McCawley, legal intern and paralegal re seeking information to assist in providing legal advice re potential litigation          | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 2          | msg  |
| 102 | 8/6/2015 2:45   | Sigrid McCawley  |                      | brad@pathtojustice.com                          | Email chain with Giuffre, McCawley, legal intern, Edwards and paralegal re seeking information to assist in providing legal advice re potential litigation | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 2          | msg  |
| 103 | 8/6/2015 2:55   | Virginia Giuffre | Smccawley@BSFLLP.com |   | Email chain with Giuffre, McCawley, legal intern and paralegal re seeking information to assist in providing legal advice re potential litigation          | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 2          | msg  |
| 104 | 8/6/2015 3:48   | Sigrid McCawley  |                      | Smccawley@BSFLLP.com,brad@pa<br>thtojustice.com | Email chain with McCawley, Giuffre, and Paralegals re seeking information to assist in legal advice, with attachments                                      | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 2          | msg  |

| Log |                 |                  |   |   |  |  | Privilege |            | Doc  |
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| ID  | Email Sent Date | Email From       | Email To  | CC Address  | Subject Matter   | Type of Privilege  | Action    | Page Count | Type |
| 105 | 8/6/2015 3:51   | Virginia Giuffre | Smccawley@BSFLLP.com  |   | Email chain with Giuffre, McCawley, legal intern and paralegal re seeking information to assist in providing legal advice re potential litigation  | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 2          | msg  |
| 106 | 9/1/2015 18:54  | Sigrid McCawley  |   | brad@pathtojustice.com,brittany@<br>pathtojustice.com | Providing and seeking information to assist in legal advice re potential legal action, with attachment   | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 2          | msg  |
| 107 | 9/7/2015 18:24  | Virginia Giuffre | brad@pathtojustice.com,sm<br>ccawley@bsfllp.com,stanpot<br>tinger@aol.com |   | Providing information sought by attorneys to provide legal advice, with attachment   | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product  | Withheld  | 1          | msg  |
| 108 |                 |                  |   |   | Attached Information sought by attorneys to provide legal advice   | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 4          | docx |
| 109 | 9/7/2015 18:58  | Sigrid McCawley  | brad@pathtojustice.com,<br>stan<br>pottinger@aol.com                      |   | Email chain with Giuffre, Edwards, Pottinger and McCawley re collection of information to assist in providing legal advice re potential litigation | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product  | Withheld  | 1          | msg  |
| 110 | 9/15/2015 21:58 | Virginia Giuffre | Smccawley@BSFLLP.com  |   | Email chain with Giuffre and McCawley re draft legal document relating to litigation   | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product  | Withheld  | 1          | msg  |

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| ID  | Email Sent Date | Email From       | Email To             | CC Address             | Subject Matter   | Type of Privilege   | Action    | Page Count | Type |
| 111 | 9/15/2015 22:04 | Sigrid McCawley  |                      |                        | Email chain with Giuffre and McCawley re draft legal document relating to litigation | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product | Withheld  | 2          | msg  |
| 112 | 9/15/2015 22:07 | Virginia Giuffre | Smccawley@BSFLLP.com |                        | Email chain with Giuffre and McCawley re draft legal document relating to litigation | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product | Withheld  | 2          | msg  |
| 113 | 9/20/2015 12:15 | Sigrid McCawley  |                      | brad@pathtojustice.com | Conveying information about potential legal action.                                  | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product | Withheld  | 1          | msg  |
| 114 | 9/20/2015 14:47 | Virginia Giuffre | Smccawley@BSFLLP.com |                        | Email chain with Giuffre and McCawley re potential legal action.                     | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product | Withheld  | 1          | msg  |
| 115 | 9/20/2015 19:16 | Virginia Giuffre | Smccawley@BSFLLP.com |                        | Email chain with Giuffre and McCawley re potential legal action.                     | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product | Withheld  | 1          | msg  |
| 116 | 9/20/2015 19:29 | Sigrid McCawley  |                      |                        | Email chain with Giuffre and McCawley re potential legal action.                     | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product | Withheld  | 2          | msg  |

| Log |                 |                  |                      |            |   |  | Privilege |            | Doc  |
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| ID  | Email Sent Date | Email From       | Email To             | CC Address | Subject Matter  | Type of Privilege  | Action    | Page Count | Type |
|     |                 |                  |                      |            |   | Attorney<br>Client/joint<br>defense/commo<br>n interest/work             |           |            |      |
| 117 | 9/20/2015 19:30 | Virginia Giuffre | Smccawley@BSFLLP.com |            | Email chain with Giuffre and McCawley re potential legal action | -  | Withheld  | 2          | msg  |
| 118 | 9/21/2015 14:48 | Sigrid McCawley  |                      |            | Communication re initiation of lawsuit, with attachments        | AC Privilege and<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld  | 1          | mra  |
| 110 | 3/21/2013 14.46 | Signa iviccawiey |                      |            | Communication re initiation of lawsuit, with attachments        | AC Privilege and   | witimeta  | 1          | msg  |
|     |                 |                  |                      |            |   | Work<br>Product/joint<br>defense/commo                                   |           |            |      |
| 119 |                 |                  |                      |            | Attached draft legal document relating to litigation            | n interest   | Withheld  | 12         | pdf  |
|     |                 |                  |                      |            |   | Attorney<br>Client/joint<br>defense/commo<br>n interest/work             |           |            |      |
| 120 |                 |                  |                      |            | Attached draft legal document relating to litigation            | product  | Withheld  | 2          | pdf  |
| 121 |                 |                  |                      |            | Attached draft legal document relating to litigation            | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product  | Withheld  | 2          | pdf  |
| 122 |                 |                  |                      |            | Attached draft legal document relating to litigation            | Attorney<br>Client/joint<br>defense/commo<br>n interest/work<br>product  | Withheld  | 3          | pdf  |

| Log | Email Sent Date   | Email From  | Email To   | CC Address | Subject Matter   | Type of Privilege  Attorney Client/joint                                 | Privilege<br>Action | Page Count   | Doc<br>Type |
|-----|---|---|--|------------|--|--|---------------------|--|-------------|
| 123 | 9/21/2015 14:51   | Virginia Giuffre  | Smccawley@BSFLLP.com   |            | Email chain with Giuffre and McCawley re potential legal action.   | defense/commo<br>n interest/work   | Withheld            | 1  | msg         |
| 125 | Emails, letters, and other communications from 2011 - Present | Virginia Giuffre, Brad<br>Edwards, Paul Cassell,<br>Brittany Henderson (and<br>other, Sigrid McCawley,<br>Meredith Schultz, David<br>Boies, Jack Scarola, Stan<br>Pottinger, Ellen<br>Brockman, Legal<br>Assistants, Professionals<br>retained by attorneys to<br>aid in the rendition of<br>legal advice and<br>representation | Virginia Giuffre, Brad<br>Edwards, Paul Cassell,<br>Brittany Henderson, Sigrid<br>McCawley, Meredith<br>Schultz, David Boies, Jack<br>Scarola, Stan Pottinger, Ellen<br>Brockman, Legal Assistants,<br>Professionals retained by<br>attorneys to aid in the<br>rendition of legal advice and<br>representation |            | 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<br>Work<br>Product/joint<br>defense/commo<br>n interest | Withheld            | Approx. 1.3K<br>docs<br>overlapping<br>with other<br>cases |             |

|     | 1                      |                           |                               |            |  |                   |           |              |      |
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| ID  | Email Sent Date        | Email From                | Email To                      | CC Address | Subject Matter   | Type of Privilege | Action    | Page Count   | Type |
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|     |                        |                           |                               |            |  |                   |           |              |      |
|     |                        |                           |                               |            |  |                   |           |              |      |
|     |                        |                           |                               |            | 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,           |                   |           |              |      |
|     |                        | • ,                       | 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,    |            | ,  | AC Privilege and  |           | Approx. 1.3K |      |
|     |                        | , ,                       | Legal Assistants,             |            | ,                            | Work              |           | docs         |      |
|     |                        | aid in the rendition of   | Professionals retained by     |            |  | Product/joint     |           | overlapping  |      |
|     | other communications   |                           | attorneys to aid in the       |            |  | defense/commo     |           | with other   |      |
| 126 | from 9/21/15 - Present | representation            | rendition of legal advice and |            | communications re evidence.  | n interest        | Withheld  | cases        |      |

| Log |                 |                           |                               |            |  |                   | Privilege |              | Doc  |
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| ID  | Email Sent Date | Email From                | Email To                      | CC Address | Subject Matter   | Type of Privilege | Action    | Page Count   | Type |
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|     |                 |                           |                               |            |  |                   |           |              |      |
|     |                 |                           |                               |            |  |                   |           |              |      |
|     |                 |                           |                               |            | 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: Bradley Edwards and Paul          |                   |           |              |      |
|     |                 | Edwards, Paul Cassell,    |                               |            | Cassell v. Alan Dershowitz ("Dershowitz case"), Case no. 15-       |                   |           |              |      |
|     |                 | Brittany Henderson,       | Virginia Giuffre, Brad        |            | 000072, pending in the Seventeenth Judicial Circuit, Broward       |                   |           |              |      |
|     |                 | Sigrid McCawley,          | Edwards, Paul Cassell,        |            | County, Florida. Documents withheld pursuant to the privileges     |                   |           |              |      |
|     |                 | Meredith Schultz, David   | Brittany Henderson, Sigrid    |            | asserted included communications from Ms. Giuffre to the           |                   |           |              |      |
|     |                 |                           | McCawley, Meredith            |            | attorneys listed seeking legal advice related to the Dershowitz    |                   |           |              |      |
|     |                 | • .                       | Schultz, David Boies,         |            | case, communications from the attorneys to Ms. Giuffre giving      |                   |           |              |      |
|     |                 | Brockman, Legal           | Stephen Zach, Stan            |            | legal advice or giving attorney mental impressions related to the  |                   |           |              |      |
|     |                 | Assistants, Professionals | Pottinger, Ellen Brockman,    |            | Dershowitz case, communications sending or attaching attorney      |                   |           | Approx. 1.3K |      |
|     |                 | retained by attorneys to  | Legal Assistants,             |            | work product related to the Dershowitz case, and/or                | Work              |           | docs         |      |
|     |                 | aid in the rendition of   | Professionals retained by     |            | communications sending or attaching client revisions to            | Product/joint     |           | overlapping  |      |
|     | '               | 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        |      |

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| 128 | Emails, letters, and other communications from 2009 - Present | Ezell, Amy Ederi, other<br>Podhurst attorneys,<br>Legal Assistants, and | Virginia Giuffre, Bob<br>Josefsberg, Katherine W.<br>Ezell, Amy Ederi, other<br>Podhurst attorneys, Legal<br>Assistants, and Professionals<br>retained by attorneys to aid<br>in the rendition of legal<br>advice |  | 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. |                                  | Withheld  | Approx. 1.3K<br>docs<br>overlapping<br>with other<br>cases |      |
| 129 | 6/10/2015   | Virginia Giuffre  |   |  | Email chain with Giuffre and McCawley seeking information to assist with attorney advice.  | Attorney Client                  | Withheld  | 2  | msg  |
| 130 |   |   |   |  | Letter from Virginia Giuffre to David Boies conveying requested information to assist in providing legal advice.   | AC Privilege and<br>Work Product | Withheld  | 26   | pdf  |
| 131 | 4/30/2015   | Brittany Henderson  | eperez@BSFLLP.com   | Smccawley@BSFLLP.com,brad@pa<br>thtojustice.com,                   | Communication re VRS registrations   | AC Privilege and<br>Work Product | Withheld  | 1  | msg  |
| 132 | 4/29/2015   | Andres Ortiz  | bh699@nova.edu  | Smccawley@BSFLLP.com,brad@pa<br>thtojustice.com,garvin@lclark.edu, | Email chain with McCawley, Edwards, Garvin, Henderson,<br>Giuffre and BSF staff re legal advice re VRS communications.   | AC Privilege and<br>Work Product | Withheld  | 1  | msg  |
| 133 | 4/29/2015   | brittany henderson  | aortiz@BSFLLP.com   | Smccawley@BSFLLP.com,brad@pa<br>thtojustice.com,garvin@lclark.edu, | Communication re legal advice re VRS communications.   | AC Privilege and<br>Work Product | Withheld  | 1  | msg  |

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| 124 | 4/17/2015       | Paul Cassell          | brad@pathtojustica.com                           | Smccawley@BSFLLP.com,brittany<br>@pathtojustice.com,eperez@BSFLL<br>P.com            | Email chain with Cassell, McCawley, Edwards, Garvin, Beloof,<br>Henderson, Giuffre and BSF staff re legal advice re VRS                   | AC Privilege and<br>Work Product | Withheld  | 5          |      |
| 134 | 4/1//2015       | Paul Cassell          | brad@pathtojustice.com                           |  | registrations.  | Work Product                     | withheid  | 5          | msg  |
| 135 | 4/17/2015       | Sigrid McCawley       | brad@pathtojustice.com,cas<br>sellp@law.utah.edu | brittany@pathtojustice.com,eperez<br>@BSFLLP.com                                     | Email chain with Cassell, McCawley, Edwards, Garvin, Beloof,<br>Henderson, Giuffre and BSF staff re legal advice re VRS<br>registrations. | AC Privilege and<br>Work Product | Withheld  | 4          | msg  |
| 136 | 4/17/2015       | Brad Edwards          | cassellp@law.utah.edu                            | Smccawley@BSFLLP.com,brittany<br>@pathtojustice.com,eperez@BSFLL<br>P.com            | Email chain with Cassell, McCawley, Edwards, Garvin, Beloof,<br>Henderson, Giuffre and BSF staff re legal advice re VRS<br>registrations. | AC Privilege and<br>Work Product | Withheld  | 4          | msg  |
| 137 | 2/26/2015       | Sigrid McCawley       |  |  | Email chain with Giuffre and McCawley re non-testifying expert.   | Attorney Client                  | Withheld  | 1          | msg  |
| 138 | 2/26/2015       | Sigrid McCawley       |  |  | Communication re non-testifying expert.   | Attorney Client                  | Withheld  | 1          | msg  |
| 139 | 2/11/2016       | Sigrid McCawley       |  |  | Email chain with Giuffre, McCawley, Edwards, Pottinger and BSF staff re media communications.   | Attorney Client                  | Redacted  | 3          | msg  |
| 140 | 2/11/2016       | Sigrid McCawley       | StanPottinger@aol.com                            | Lcarlsen@BSFLLP.com,brad@patht ojustice.com  | Email chain with Giuffre, McCawley, Edwards, Pottinger and BSF staff re media communications.   | Attorney Client                  | Redacted  | 3          | msg  |
| 141 | 2/11/2016       | StanPottinger@aol.com |  | Lcarlsen@BSFLLP.com,Smccawley<br>@BSFLLP.com,brad@pathtojustice.<br>com              | Email chain with Giuffre, McCawley, Edwards, Pottinger and BSF staff re media communications.   | Attorney Client                  | Redacted  | 3          | msg  |
| 142 | 2/9/2016        | StanPottinger@aol.com |  |  | Email chain with Giuffre and Pottinger re media communications.   | Attorney Client                  | Redacted  | 2          | msg  |
| 143 |                 |                       |  |  | Letter from Virginia Giuffre to David Boies conveying requested information to assist in providing legal advice.                          | AC Privilege and<br>Work Product | Withheld  | 26         | pdf  |
| 144 |                 |                       |  |  | Letter from Virginia Giuffre to David Boies conveying requested information to assist in providing legal advice.                          | AC Privilege and<br>Work Product | Withheld  | 23         | docx |
| 145 | 6/10/2015       | Virginia Giuffre      |  |  | Email chain with Giuffre and McCawley re ongoing litigation.  | Attorney Client                  | Withheld  | 2          | msg  |
| 146 | 4/29/2015       | Virginia Giuffre      | aortiz@BSFLLP.com                                | Smccawley@BSFLLP.com,bh699@n<br>ova.edu,brad@pathtojustice.com,g<br>arvin@lclark.edu | Email chain with Henderson, McCawey, Edwards, Garvin and BSF staff re VRS communications.   | Attorney Client                  | Withheld  | 2          | msg  |
| 147 | 4/10/2015       | Virginia Giuffre      | rebecca.boylan@yahoo.com                         |  | Email chain with Boylan, Giuffre, McCawley, and BSF staff re legal advice re VRS registrations.   | Attorney Client                  | Withheld  | 2          | msg  |
| 148 | 2/26/2015       | Virginia Giuffre      | Smccawley@BSFLLP.com                             |  | Email confirming legal advice re non-testifying expert.   | Attorney Client                  | Withheld  | 1          | msg  |

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|     | - 4   |   |   |            | Email chain with Giuffre and Pottinger re media                   |                             |           |                           |      |
| 149 | 2/11/2015                                   | Virginia Giuffre                                    | StanPottinger@aol.com                             |            | communications  | Attorney Client             | Redacted  | 3                         | msg  |
|     | 2/44/2045                                   |   |   |            | Email chain with Giuffre, McCawley, Pottinger and BSF staff re    |                             |           | _                         |      |
| 150 | 2/11/2015                                   | Virginia Giuffre                                    | Smccawley@BSFLLP.com                              |            | media communications.   | Attorney Client             | Redacted  | 3                         | msg  |
|     |   |   |   |            |   | AC Privilege and            |           |                           |      |
| 151 | 1/13/2015                                   | Virginia Giuffre                                    | StanPottinger@aol.com                             |            | Email chain with Pottinger and Giuffre re anticipated litigation. | Work Product                | Withheld  |                           |      |
| 151 | 1/13/2013                                   | viigiilla diullie                                   | Staff Ottinger (waoi.com                          |            | Email Chain with Pottinger and Glume re anticipated itigation.    | WOIK FIOUUCE                | witillelu | 1                         | msg  |
|     |   |   |   |            | 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). This categorical entry is regarding correspondence       |                             |           |                           |      |
|     |   |   |   |            | re potential legal action against entities and individuals.       |                             |           |                           |      |
|     |   | Virginia Giuffre, Brad                              |   |            | Documents withheld pursuant to the privileges asserted            |                             |           |                           |      |
|     |   | Edwards, Paul Cassell,                              | Virginia Giuffre, Brad                            |            | included communications from Ms. Giuffre to the                   |                             |           |                           |      |
|     |   | Brittany Henderson,                                 | Edwards, Paul Cassell,                            |            | attorneys listed seeking legal advice related to potential        |                             |           |                           |      |
|     |   | Sigrid McCawley,                                    | Brittany Henderson, Sigrid                        |            | law suits, communications from the attorneys to Ms.               |                             |           |                           |      |
|     |   | Meredith Schultz, David                             | McCawley, Meredith                                |            | Giuffre giving legal advice or giving attorney mental             |                             |           |                           |      |
|     |   | Boies, Stephen Zach,                                | Schultz, David Boies,                             |            | impressions related to the law suits, communications              |                             |           |                           |      |
|     |   | Stan Pottinger, Ellen                               | Stephen Zach, Stan                                |            | sending or attaching attorney work product related to             |                             |           |                           |      |
|     | For all a latter and                        | Brockman, Legal                                     | Pottinger, Ellen Brockman,                        |            | potential lawsuits, and/or communications sending or              | AC Privilege and<br>Work    |           | 4 4 21/                   |      |
|     | Emails, letters, and                        | Assistants, Professionals                           | Legal Assistants,                                 |            | attaching client revisions to attorney work product related       |                             |           | Approx. 1.3K              |      |
|     | other communications<br>from January 2015 - | retained by attorneys to<br>aid in the rendition of | Professionals retained by attorneys to aid in the |            | to potential lawsuits, and communications re evidence.            | Product/joint defense/commo |           | overlapping<br>with other |      |
| 152 | Present                                     | legal advice  | rendition of legal advice                         |            | to potential lawsuits, and communications re evidence.            | n interest                  | Withheld  | cases                     |      |
| 152 | Present                                     | iegai duvice  | renultion of legal advice                         |            | ]   | minterest                   | withheid  | cases                     | Ь    |

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| 153       | Email and letter | The law enforcement<br>entity, Virginia Giuffre,<br>David Boies, Stan<br>Pottinger, Sigrid<br>McCawley, Paul Cassell,<br>Brad Edwards | The law enforcement entity,<br>Virginia Giuffre, David Boies,<br>Stan Pottinger, Sigrid<br>McCawley, Paul Cassell, Brad<br>Edwards |            | 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). This categorical entry is regarding correspondence re the currently ongoing criminal investigation of Defendant and others. |                   | Withheld            | approx. 57<br>documents |             |