

## **EXHIBIT K**

BOIES, SCHILLER & FLEXNER LLP

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Sigrid S. McCawley, Esq.  
E-mail: [smccawley@bsflp.com](mailto:smccawley@bsflp.com)

June 10, 2016

VIA E-MAIL

Laura A. Menninger, Esq.  
HADDON, MORGAN AND FOREMAN, P.C.  
150 East 10<sup>th</sup> Avenue  
Denver, Colorado 80203  
[lmenninger@hmflaw.com](mailto:lmenninger@hmflaw.com)

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

Dear Ms. Menninger:

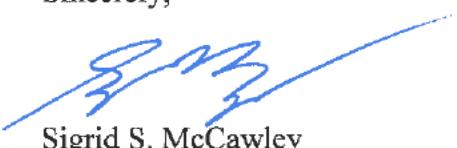
On behalf of the Plaintiff, Virginia Giuffre, documents, Bates-stamped GIUFFRE005607 through GIUFFRE005613, are being produced pursuant to Defendant's Request for Production. Certain of the documents within this production have been designated as CONFIDENTIAL in accordance with your proposed Protective Order. Please treat these documents accordingly.

This production consists solely of all data that is responsive to Defendant's various requests for production from Ms. Giuffre's iCloud account.

Attached to this letter, please also find an updated privilege log.

If you have any questions concerning the foregoing, or if there are any issues with the media, please do not hesitate to contact me at (954) 356-0011.

Sincerely,



Sigrid S. McCawley

SSM:dk  
Enclosures

**From:** [Richards, Jason R.](#)  
**To:** [Robert Giuffre](#)  
**Subject:** RE: Hi There  
**Date:** Wednesday, August 27, 2014 10:44:32 AM

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Hi Jenna,

My suggestion is for you to do a Freedom of Information Act request ([www.foia.gov](http://www.foia.gov)) for the information you are looking for because I am not able to release information (should there be any) from FBI records. You need to include as many details as possible so they can focus and narrow the search. Explain that you are looking for information related to your recovery as a victim of [REDACTED]. The process may take some time but it is the appropriate method for you to obtain any possible records regarding your recovery. Hope this helps.

Best wishes,

Jason

-----Original Message-----

From: [REDACTED]  
Sent: Wednesday, August 27, 2014 9:49 AM  
To: Richards, Jason R.  
Subject: Hi There

G'day Jason,

I know I am a pain in your rear right now and I don't want to be but I am so close to wrapping up an era, just need a couple dates confirmed is all.

If you aren't sure about the dates which you have already said that's fine. I have turned the Wilton Manors police dept upside down looking through records and come up w nada. What was your acquaintance's name that took my statement about [REDACTED] Is it possible that it wasn't Wilton Manors and maybe it was somewhere else?

I'm really racking my brain about this!! It would be a personal favor to me and I am so very much appreciative of anything you might know!!

Thanks a lot mate!!

Jenna

Sent from my iPhone

**From:** [Richards, Jason R.](#)  
**To:** [REDACTED]  
**Subject:** Re: Hi There  
**Date:** Wednesday, August 27, 2014 10:50:27 AM

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Feel free to reach out to me any time.  
Take care.

Jason

----- Original Message -----

From: [REDACTED]  
To: Richards, Jason R.  
Sent: Wed Aug 27 10:46:50 2014  
Subject: Re: Hi There

Thank you Jason. I hope all has been well for you and yours!

All the best, I won't bother you again.

Jenna

Sent from my iPhone

> On Aug 27, 2014, at 10:44 AM, "Richards, Jason R." <Jason.Richards2@ic.fbi.gov> wrote:  
>  
> Hi Jenna,  
>  
> My suggestion is for you to do a Freedom of Information Act request ([www.foia.gov](http://www.foia.gov)) for the information you are looking for because I am not able to release information (should there be any) from FBI records. You need to include as many details as possible so they can focus and narrow the search. Explain that you are looking for information related to your recovery as a victim of [REDACTED]. The process may take some time but it is the appropriate method for you to obtain any possible records regarding your recovery. Hope this helps.  
>  
> Best wishes,  
>  
> Jason  
>  
> -----Original Message-----  
> From: [REDACTED]  
> Sent: Wednesday, August 27, 2014 9:49 AM  
> To: Richards, Jason R.  
> Subject: Hi There  
>  
> G'day Jason,  
>  
> I know I am a pain in your rear right now and I don't want to be but I am so close to wrapping up an era, just need a couple dates confirmed is all.  
>  
> If you aren't sure about the dates which you have already said that's fine. I have turned the Wilton Manors police dept upside down looking through records and come up w nada. What was your acquaintance's name that took my statement about [REDACTED]? Is it possible that it wasn't Wilton Manors and maybe it was somewhere else?  
>  
> I'm really racking my brain about this!! It would be a personal favor to me and I am so very much appreciative of anything you might know!!

>  
> Thanks a lot mate!!  
>  
> Jenna  
>  
> Sent from my iPhone

**From:** [REDACTED]  
**To:** [Jason.Richards2@ic.fbi.gov](mailto:Jason.Richards2@ic.fbi.gov)  
**Subject:** Virginia Roberts(Jane doe 102)  
**Date:** Tuesday, April 15, 2014 9:50:31 AM

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Hi Jason,

Long time, no talk. I hope all has been well for you and yours!! I am now back in the USA, not too many people know about that and I'd like to keep it that way as my case against Jeffrey Epstein has intensified!! I am here to get this BS non- prosecution agreement thrown out and speaking w Judge Paul Cassal he suggested trying to get ahold of any photos and/or video recordings released by the FBI to assist our case further in proving how much pedophilia occurred by Jeffrey and the many other monsters he obliged w underage girls. If this is a possibility please let me know so I can give you Brad Edwards( my attorney) his contact details. Many thanks for your time and I hope we should meet again.

Kindest Regards,  
Virginia Roberts  
Phone [REDACTED] 8

Sent from my iPhone

**From:** [REDACTED]  
**To:** [christina.pyror@ic.fbi.gov](mailto:christina.pyror@ic.fbi.gov)  
**Subject:** Virginia Roberts re: Jeffrey Epstein Case  
**Date:** Wednesday, April 16, 2014 1:52:05 PM

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Hi Christina,

I was wondering if you remember me from Sydney Consulate, I am a victim in the investigation from the Jeffrey Epstein case and was wondering if you could tell me if I would be able to get ahold of any of the pics and/or videos that the FBI might have confiscated from any of Epstein's residences? Also can I ask if you might have any of the flight logs that include my name in them to be sent to me as well. It's all for evidential purposes and would prove a many of things to help my case.

Kindest Regards,  
Virginia Roberts

[REDACTED]  
Sent from my iPhone

**From:** [sharonrikard@gmail.com](mailto:sharonrikard@gmail.com) on behalf of [Sharon Rikard](#)  
**To:** [Virginia Giuffre](#)  
**Subject:** Re: Victims Refuse Silence  
**Date:** Saturday, March 28, 2015 9:49:55 AM

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Hi Virginia,

So sorry for the late response. Our organization currently works with survivors of sex trafficking provided continuing education, life skills and counseling. We will help with transportation and their basic necessities. Our ultimate goal is a home for domestic minor sex trafficking survivors.

Our contact information is:

[doorstofreedom.com](http://doorstofreedom.com)  
[infor@doorstofreedom.com](mailto:infor@doorstofreedom.com)  
[843-817-0740](tel:843-817-0740)

I am going to forward your information to our Attorney Generals office as Marie Sazehn has compiled a list of organizations in our state of people/organizations and their involvement in helping survivors.

Thanks for all you are doing to help others!

Blessings,  
Sharon Rikard

**From:** [Virginia Giuffre](#)  
**To:** [sharon@doorstofreedom.com](mailto:sharon@doorstofreedom.com)  
**Subject:** Victims Refuse Silence  
**Date:** Wednesday, March 18, 2015 12:19:06 PM

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Hi Sharon,

This is Virginia, we spoke earlier and I just wanted to say thank you for your time and what your doing to help the victims in your area. The mentality has to be changed!! Good luck!!

Kindest Regards,  
Virginia Roberts

Sent from my iPhone

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
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	AC Privilege and Work Product/joint defense/common interest	Withheld	3	msg
2	2/16/2015 1:05	StanPottinger@aol.com	Smccawley@BSFLLP.com,brad@pathtojustice.com, [REDACTED]		Discussion of evidence among client and attorneys	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg
3	2/16/2015 15:37	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley, Pottinger and Edwards re information provided by client to assist in legal advice	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
4	2/16/2015 16:15	Sigrid McCawley	[REDACTED]		Email chain with Giuffre, McCawley, Pottinger and Edwards re information provided by client to assist in legal advice	Attorney Client/joint defense/common interest/work 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 Client/joint defense/common interest/work product	Withheld	2	msg
6	2/16/2015 16:24	Sigrid McCawley	[REDACTED]		Email chain with Giuffre, McCawley, Pottinger and Edwards re information provided by client to assist in legal advice	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
7	2/21/2015 16:45	Sigrid McCawley	StanPottinger@aol.com,brad@pathtojustice.com,cassellp@law.utah.edu,[REDACTED]	Smccawley@BSFLLP.com	Discussion of evidence among client and attorneys	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg

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

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc 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 Work Product/joint defense/common interest	Withheld	4	msg
16					Attached case research	AC Privilege and Work Product/joint defense/common 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 Work Product/joint defense/common interest	Withheld	1	msg
18					Attached draft legal document	AC Privilege and Work Product/joint defense/common 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 Work Product/joint defense/common interest	Withheld	3	msg
20	3/13/2015 17:29	Stan Pottinger		Smccawley@BSFLLP.com,brad@patttojustice.com	Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/common 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 Work Product/joint defense/common interest	Withheld	2	msg

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
22	3/13/2015 17:56	StanPottinger@aol.com		Smccawley@BSFLLP.com,brad@pathtojustice.com	Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/common interest	Withheld	3	msg
23	3/13/2015 18:00	Brad Edwards	StanPottinger@aol.com, [REDACTED]	Smccawley@BSFLLP.com	Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/common 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 Work Product/joint defense/common 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 Work Product/joint defense/common interest	Withheld	3	msg
26	3/13/2015 21:53	Virginia Giuffre	brad@pathtojustice.com	Smccawley@BSFLLP.com,StanPottinger@aol.com	Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/common interest	Withheld	4	msg
27	3/13/2015 23:38	Brad Edwards	[REDACTED]		Email chain with Giuffre, Edwards, McCawley, Henderson and Pottinger re legal advice on media issues	AC Privilege and Work Product/joint defense/common 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 Work Product/joint defense/common interest	Withheld	4	msg

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

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
35	3/24/2015 21:21	Virginia Giuffre	Smccawley@BSFLLP.com	aortiz@BSFLLP.com	Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
36	3/24/2015 21:36	Andres Ortiz	Smccawley@BSFLLP.com, [REDACTED]		Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/common interest/work 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 Client/joint defense/common interest/work product	Withheld	3	msg
38	3/26/2015 2:00	Sigrid McCawley	[REDACTED]	Smccawley@BSFLLP.com, StanPottinger@aol.com, brad@pathtojustice.com, brittany@pathtojustice.com, eperez@BSFLLP.com	Email chain with Giuffre, Edwards, Henderson, Pottinger, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
39	3/26/2015 2:21	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
40	3/26/2015 2:22	Sigrid McCawley	[REDACTED]		Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
41	3/26/2015 3:00	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice related to VRS	Attorney Client/joint defense/common interest/work 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 Client/joint defense/common interest/work product	Withheld	1	msg
43	4/2/2015 7:01	Brittany Henderson	[REDACTED]	eperez@BSFLLP.com	Providing draft legal document for client review, with attachment	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
44					Attached Draft legal document	AC Privilege and Work Product/joint defense/common interest	Withheld	15	pdf
45	4/3/2015 15:32	Brittany Henderson	[REDACTED]	brad@pathtojustice.com,eperez@BSFLLP.com	Email chain with Giuffre, Henderson, Edwards and legal assistant re legal document, with attachment	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg
46					Attached draft legal document	AC Privilege and Work Product/joint defense/common interest		15	pdf

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
47	4/8/2015 20:34	Virginia Giuffre	Smccawley@BSFLLP.com		Seeking legal advice related to VRS	Attorney Client/joint defense/common interest/work 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 Client/joint defense/common interest/work product	Withheld	2	msg
49	4/9/2015 7:16	Sigrid McCawley	StanPottinger@aol.com,brad@pathtojustice.com,[REDACTED]	brittany@pathtojustice.com,sperkins@BSFLLP.com	Email chain with Giuffre, Edwards, Henderson, McCawley and BSF staff re legal advice re media issues	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
50	4/9/2015 9:26	Brad Edwards	Smccawley@BSFLLP.com	[REDACTED]	Email chain with Giuffre, Edwards, and McCawley re legal advice re media issues	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
51	4/9/2015 9:33	Sigrid McCawley	[REDACTED]		Email chain with Giuffre and McCawley re legal advice re media issues	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
52	4/9/2015 12:46	Sigrid McCawley	[REDACTED]		Conveying legal advice re draft legal documents to client, with attachments	AC Privilege and Work Product/joint defense/common interest	Withheld	1	msg

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

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
60					Attached draft legal document	AC Privilege and Work Product/joint defense/common interest	Withheld	21	pdf
61	4/10/2015 17:40	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
62	4/10/2015 19:10	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
63	4/10/2015 19:28	Sigrid McCawley	[REDACTED]		Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
64	4/10/2015 19:33	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg
65	4/10/2015 20:03	Sigrid McCawley	[REDACTED]		Email chain with Giuffre, McCawley and BSF staff regarding legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	2	msg

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc 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	Attorney Client/joint defense/common interest/work product	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	Attorney Client/joint defense/common interest/work product	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 Work Product/joint defense/common interest	Withheld	3	msg
69	4/13/2015 13:52	Sigrid McCawley		StanPottinger@aol.com,brad@pathtojustice.com	Email chain with Giuffre, Pottinger, Edwards and McCawley re legal advice regarding potential public statements	AC Privilege and Work Product/joint defense/common interest	Withheld	3	msg
70	4/13/2015 13:56	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, Pottinger, Edwards and McCawley re legal advice regarding media issues	AC Privilege and Work Product/joint defense/common interest	Withheld	3	msg
71	4/14/2015 23:38	Brad Edwards	Smccawley@BSFLLP.com,brittany@pathtojustice.com stanpottinger@aol.com		Providing legal advice related to VRS	Attorney Client/joint defense/common interest/work product	Withheld	1	msg

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc 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 Client/joint defense/common interest/work 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 Client/joint defense/common interest/work product	Withheld	2	msg
74	4/24/2015 19:22	Sigrid McCawley			Providing legal advice re records retention, with attachments	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
75					Attached letter providing legal advice re document retention	Attorney Client/joint defense/common interest/work 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 Client/joint defense/common interest/work product	Withheld	1	msg
77	4/27/2015 21:20	Brad Edwards		Smccawley@BSFLLP.com	Seeking information to assist in providing legal advice	Attorney Client/joint defense/common interest/work product	Withheld	1	msg

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

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

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

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
98	7/27/2015 21:53	Virginia Giuffre	Smccawley@BSFLLP.com		Providing information to assist in legal advice re potential litigation	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
99	7/29/2015 19:45	Sigrid McCawley		StanPottinger@aol.com	Conveying legal advice on media issues	Attorney Client/joint defense/common interest/work 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 Work Product/joint defense/common 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 Work Product/joint defense/common 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 Work Product/joint defense/common 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 Work Product/joint defense/common interest	Withheld	2	msg
104	8/6/2015 3:48	Sigrid McCawley		Smccawley@BSFLLP.com,brad@pathtojustice.com	Email chain with McCawley, Giuffre, and Paralegals re seeking information to assist in legal advice, with attachments	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc 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 Work Product/joint defense/common interest	Withheld	2	msg
106	9/1/2015 18:54	Sigrid McCawley		brad@pathtojustice.com, brittany@pathtojustice.com	Providing and seeking information to assist in legal advice re potential legal action, with attachment	AC Privilege and Work Product/joint defense/common interest	Withheld	2	msg
107	9/7/2015 18:24	Virginia Giuffre		brad@pathtojustice.com,smccawley@bsfllp.com,stanpottinger@aol.com	Providing information sought by attorneys to provide legal advice, with attachment	Attorney Client/joint defense/common interest/work product	Withheld	1	msg
108					Attached Information sought by attorneys to provide legal advice	AC Privilege and Work Product/joint defense/common interest	Withheld	4	docx
109	9/7/2015 18:58	Sigrid McCawley		brad@pathtojustice.com, stanpottinger@aol.com	Email chain with Giuffre, Edwards, Pottinger and McCawley re collection of information to assist in providing legal advice re potential litigation	Attorney Client/joint defense/common interest/work 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 Client/joint defense/common interest/work product	Withheld	1	msg

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
111	9/15/2015 22:04	Sigrid McCawley			Email chain with Giuffre and McCawley re draft legal document relating to litigation	Attorney Client/joint defense/common interest/work 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 Client/joint defense/common interest/work product	Withheld	2	msg
113	9/20/2015 12:15	Sigrid McCawley		brad@pathtojustice.com	Conveying information about potential legal action.	Attorney Client/joint defense/common interest/work 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 Client/joint defense/common interest/work 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 Client/joint defense/common interest/work product	Withheld	1	msg
116	9/20/2015 19:29	Sigrid McCawley			Email chain with Giuffre and McCawley re potential legal action.	Attorney Client/joint defense/common interest/work product	Withheld	2	msg

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

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

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
126	Emails, letters, and other communications from 9/21/15 - Present	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson, Sigrid McCawley, Meredith Schultz, David Boies, Stephen Zach, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal advice and representation	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson, Sigrid McCawley, Meredith Schultz, David Boies, Stephen Zach, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal advice and representation		<p>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: Giuffre v. Maxwell ("Maxwell case"), 15-cv-07433-RWS, pending in the Southern District of New York, since the date of filing, September 21, 2015. Documents withheld pursuant to the privileges asserted included communications from Ms. Giuffre to the attorneys listed seeking legal advice related to the Maxwell case, communications from the attorneys to Ms. Giuffre giving legal advice or giving attorney mental impressions related to the Maxwell case, communications sending or attaching attorney work product related to the Maxwell case, and/or communications sending or attaching client revisions to attorney work product related to the Maxwell case, and communications re evidence.</p>	AC Privilege and Work Product/joint defense/common interest	Withheld	Approx. 1.3K docs overlapping with other cases	

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
127	Emails, letters, and other communications from January 2015 - Present	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson, Sigrid McCawley, Meredith Schultz, David Boies, Stephen Zach, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal advice and representation	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson, Sigrid McCawley, Meredith Schultz, David Boies, Stephen Zach, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal advice and representation		<p>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: <i>Bradley Edwards and Paul Cassell v. [REDACTED]</i> [REDACTED] pending in the Seventeenth Judicial Circuit, Broward County, Florida. Documents withheld pursuant to the privileges asserted included communications from Ms. Giuffre to the attorneys listed seeking legal advice related to the [REDACTED] case, communications from the attorneys to Ms. Giuffre giving legal advice or giving attorney mental impressions related to the [REDACTED] case, communications sending or attaching attorney work product related to the [REDACTED] case, and/or communications sending or attaching client revisions to attorney work product related to the [REDACTED] case, and communications re evidence.</p>	AC Privilege and Work Product/joint defense/common interest	Withheld	Approx. 1.3K docs overlapping with other cases	

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
128	Emails, letters, and other communications from 2009 - Present	Virginia Giuffre, Bob Josefsberg, Katherine W. Ezell, Amy Ederi, other Podhurst attorneys, Legal Assistants, and Professionals retained by attorneys to aid in the rendition of legal advice	Virginia Giuffre, Bob Josefsberg, Katherine W. Ezell, Amy Ederi, other Podhurst attorneys, Legal Assistants, and Professionals retained by attorneys to aid in the rendition of legal advice		<p>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: <i>Jane Doe No. 102 v. Jeffrey Epstein</i> ("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.</p>	AC Privilege and Work Product/joint defense/common interest	Withheld	Approx. 1.3K docs overlapping with other 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 Work Product	Withheld	26	pdf
131	4/30/2015	Brittany Henderson	eperez@BSFLLP.com	Smccawley@BSFLLP.com,brad@patttojustice.com, [REDACTED]	Communication re VRS registrations	AC Privilege and Work Product	Withheld	1	msg
132	4/29/2015	Andres Ortiz	bh699@nova.edu	Smccawley@BSFLLP.com,brad@patttojustice.com,garvin@lclark.edu, [REDACTED]	Email chain with McCawley, Edwards, Garvin, Henderson, Giuffre and BSF staff re legal advice re VRS communications.	AC Privilege and Work Product	Withheld	1	msg
133	4/29/2015	brittany henderson	aortiz@BSFLLP.com	Smccawley@BSFLLP.com,brad@patttojustice.com,garvin@lclark.edu, [REDACTED]	Communication re legal advice re VRS communications.	AC Privilege and Work Product	Withheld	1	msg

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
134	4/17/2015	Paul Cassell	brad@pathtojustice.com	Smccawley@BSFLLP.com, brittany@pathtojustice.com, eperez@BSFLLP.com, [REDACTED]	Email chain with Cassell, McCawley, Edwards, Garvin, Beloof, Henderson, Giuffre and BSF staff re legal advice re VRS registrations.	AC Privilege and Work Product	Withheld	5	msg
135	4/17/2015	Sigrid McCawley	brad@pathtojustice.com, cassellp@law.utah.edu	brittany@pathtojustice.com, eperez@BSFLLP.com, [REDACTED]	Email chain with Cassell, McCawley, Edwards, Garvin, Beloof, Henderson, Giuffre and BSF staff re legal advice re VRS registrations.	AC Privilege and Work Product	Withheld	4	msg
136	4/17/2015	Brad Edwards	cassellp@law.utah.edu	Smccawley@BSFLLP.com, brittany@pathtojustice.com, eperez@BSFLLP.com, [REDACTED]	Email chain with Cassell, McCawley, Edwards, Garvin, Beloof, Henderson, Giuffre and BSF staff re legal advice re VRS registrations.	AC Privilege and Work Product	Withheld	4	msg
137	2/26/2015	Sigrid McCawley	[REDACTED]		Email chain with Giuffre and McCawley re non-testifying expert.	Attorney Client	Withheld	1	msg
138	2/26/2015	Sigrid McCawley	[REDACTED]		Communication re non-testifying expert.	Attorney Client	Withheld	1	msg
139	2/11/2016	Sigrid McCawley	[REDACTED]		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, [REDACTED]	Lcarlsen@BSFLLP.com, brad@pathtojustice.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	[REDACTED]	Lcarlsen@BSFLLP.com, Smccawley@BSFLLP.com, brad@pathtojustice.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	[REDACTED]		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 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 Work Product	Withheld	23	docx
145	6/10/2015	Virginia Giuffre	[REDACTED]		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@nova.edu, brad@pathtojustice.com, garvin@lclark.edu	Email chain with Henderson, McCawley, Edwards, Garvin and BSF staff re VRS communications.	Attorney Client	Withheld	2	msg
147	4/10/2015	Virginia Giuffre	[REDACTED]		Email chain with [REDACTED] 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

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
149	2/11/2015	Virginia Giuffre	StanPottinger@aol.com		Email chain with Giuffre and Pottinger re media communications	Attorney Client	Redacted	3	msg
150	2/11/2015	Virginia Giuffre	Smccawley@BSFLLP.com		Email chain with Giuffre, McCawley, Pottinger and BSF staff re media communications.	Attorney Client	Redacted	3	msg
151	1/13/2015	Virginia Giuffre	StanPottinger@aol.com		Email chain with Pottinger and Giuffre re anticipated litigation.	AC Privilege and Work Product	Withheld	1	msg
152	Emails, letters, and other communications from January 2015 - Present	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson, Sigrid McCawley, Meredith Schultz, David Boies, Stephen Zach, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal advice	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson, Sigrid McCawley, Meredith Schultz, David Boies, Stephen Zach, Stan Pottinger, Ellen Brockman, Legal Assistants, Professionals retained by attorneys to aid in the rendition of legal 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). This categorical entry is regarding correspondence re potential legal action against entities and individuals. Documents withheld pursuant to the privileges asserted included communications from Ms. Giuffre to the attorneys listed seeking legal advice related to potential law suits, communications from the attorneys to Ms. Giuffre giving legal advice or giving attorney mental impressions related to the law suits, communications sending or attaching attorney work product related to potential lawsuits, and/or communications sending or attaching client revisions to attorney work product related to potential lawsuits, and communications re evidence.	AC Privilege and Work Product/joint defense/common interest	Withheld	Approx. 1.3K overlapping with other cases	

Log ID	Email Sent Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Privilege Action	Page Count	Doc Type
153	Email and letter communications	The law enforcement entity, Virginia Giuffre, David Boies, Stan Pottinger, Sigrid McCawley, Paul Cassell, Brad Edwards	The law enforcement entity, Virginia Giuffre, David Boies, Stan Pottinger, Sigrid McCawley, Paul Cassell, Brad 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.	Public Interest	Withheld	approx. 57 documents	
154	8/27/2014	Virginia Giuffre	Brad Edwards		Email chain discussing efforts to obtain assistance from FBI agent in obtaining information to assist in providing legal advice.	AC Privilege and Work Product	Withheld	1	msg
155	8/27/2014	Virginia Giuffre	Brad Edwards		Email chain discussing efforts to obtain assistance from FBI agent in obtaining information to assist in providing legal advice.	AC Privilege and Work Product	Withheld	1	msg
156	8/27/2014	Virginia Giuffre	Brad Edwards		Email chain discussing efforts to obtain assistance from FBI agent in obtaining information to assist in providing legal advice.	AC Privilege and Work Product	Withheld	1	msg