

PAUL G. CASSELL

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December 13, 2018

VIA CM/ECF

Honorable Magistrate Judge Sarah Netburn
United States District Court
Thurgood Marshall Courthouse
40 Foley Square, Rm 430
New York, NY 10007

**Re: *Jane Doe 43 v. Jeffrey Epstein, et al.*,
Case No.: 17-cv-00616 (JGK) – Letter Motion Seeking Pre-Motion Conference**

Dear Judge Netburn,

We write today to request a pre-motion conference, pursuant to Local Civil Rule 37.2, to seek the Court's guidance as to compelling defendant Maxwell to produce requested documents.

As the Court will recall, this is a case in which the plaintiff, Ms. Sarah Ransome, has alleged that she was sexually trafficked by Jeffrey Epstein and his co-defendants, including defendant Ghislaine Maxwell. Maxwell is the only one of the four defendants who did not invoke her Fifth Amendment right against self-incrimination to refuse to produce documents. But in response to Ms. Ransome's requests for production, Ms. Maxwell produced very little information.

Following that limited production, counsel for Ms. Ransome clarified her requests for production, via email. *See* Attachment A. Counsel for Ms. Ransome and Ms. Maxwell then conferred via telephone on November 21, 2018, but were unsuccessful in narrowing many of the substantive disputes.

While there are various individual issues about the requests for production, there are several overarching disputes that we think might usefully be discussed in a pre-motion conference.

* This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah.

The Relevant Time Period for Production

The parties dispute the relevant time period for production. Ms. Ransome believes that the relevant time period extends for the multiple years during which the sex trafficking organization operated. But Ms. Maxwell has refused to produce for years that organization was in operation, taking the position that the “relevant period” for this case is narrowly confined to just September 2006 through April 2007.

Ms. Ransome’s complaint spans a much broader time period than those eight months. For example, paragraph 14 of the First Amended Complaint (“FAC”) alleges that “Defendant Maxwell was *for decades* the highest-ranking employee of the Defendants’ sex trafficking venture and enterprise.” And with regard to events following 2007, the First Amended Complaint specifically alleges that (among other things) “In and after May 2007, Defendants actively concealed and covered up what they had done to Plaintiff and other similarly situated females. Defendant’s coverup included efforts to intimidate witnesses who might provide corroborating testimony to Plaintiff as well as destruction of documents and other evidence regarding what they had done.” FAC at ¶ 65.

Judge Koeltl has already recognized the breadth of the allegations in denying a motion to strike a part of the complaint dealing with earlier events. In particular, Judge Koeltl recognized that under Rule 404(b), evidence of trafficking other girls or women by the sex trafficking organization could be relevant to showing what happened to Ms. Ransome:

The portion of the amended complaint subject to the motion to strike provides specific facts in support of the plaintiff’s allegations that she was recruited and enticed into performing sex acts with Epstein as part of a larger enterprise to provide Epstein with young females for sex, in which each defendant allegedly played a specific role. The defendants contend that the plaintiff was a younger woman who willingly accepted the blandishments of a wealthy older man. The knowledge and intent of the defendants will plainly be an issue. The paragraphs of the amended complaint that the defendants seek to strike may be evidence of the defendants’ knowledge and intent in their dealings with the plaintiff. See Federal Rule of Evidence 404(b). Accordingly, the motion to strike is denied.

Transcript (“Tr.”) of Aug. 7, 2018, hearing at 47-48.

In light of the breadth Ms. Ransome's complaint – and Judge Koeltl's earlier ruling – Ms. Maxwell should produce documents for a much broader period of time, as indicated in particular requests for production. For example, Request for Production Number 1 requests Maxwell's passport entries from 2000 to 2008. Ms. Maxwell should produce for that entire time period, as that may assist in showing her traveling in connection with sexually trafficking women and girls.

Ms. Maxwell's Financial Information

Ms. Ransome has sought financial information from Ms. Maxwell, including her tax returns. *See, e.g.* RFP 16 (requesting tax returns and related information). Ms. Maxwell has declined to produce such information. Ms. Maxwell has taken the position that the request is "harassing" because, in her view, her "financial information is not at issue in this matter and information relating thereto is irrelevant." But numerous financial issues are interwoven into this case. For example, as alleged in ¶ 62 of the First Amended Complaint, "Defendants Epstein and Maxwell continued to provide Plaintiff with things of value in exchange for Plaintiff's continued compliance with Epstein's sexual demands" Maxwell's financial ability to provide things of value is thus directly at issue. In addition, as alleged in ¶ 66 of the First Amended Complaint, "Defendants knowingly benefitted financially and received things of value as a result of coercing and inducing Plaintiff into sexual compliance and otherwise participating in their illegal venture and enterprise." These things of value she received from being a leader in Epstein's sex trafficking organization may very well appear in income or other entries on Ms. Maxwell's tax returns.

The "things of value" addressed in the Complaint tie directly into the statutory provisions that Ms. Ransome relies upon in filing her complaint. Under 18 U.S.C. § 1591, anyone who "benefits, financially or by receiving *anything of value* from participation in a [sex trafficking] venture" is potentially covered by the statute (emphasis added). Thus, Ms. Maxwell's receipt (or distribution) of "things of value" may be an element of the cause of action that Ms. Ransome has to prove at trial. Of course, tax returns frequently reflect "things of value."

Employee or Business Records Associated with Jeffrey Epstein

Ms. Ransome has asked Ms. Maxwell to produce "[a]ll documents relating to any employee lists or records associated with you, Jeffrey Epstein or any related entity." In addition to raising the question of the relevant time period discussed above, Ms. Maxwell has argued that the term "entity" is unduly broad. Ms. Ransome has responded by clarifying that "[w]ith regard to 'entity,' an entity associated with Ms.

Maxwell might be a means for receiving or transmitting ‘things of value’ that are the subject of this litigation, as specifically discussed in the complaint.” *See* Attachment A. Maxwell still has declined to produce.

Information in Ms. Maxwell’s possession regarding employee or business records associated with Jeffrey Epstein is clearly relevant in a case involving an alleged sex trafficking organization. And the use of such terms as “entity” as appropriate, given that Mr. Epstein has invoked his Fifth Amendment rights rather than explain how the organization was structured. Ms. Ransome has good reason for believing that business “entities” of various types have been used to conceal the existence of the sex trafficking organization, and Ms. Maxwell should be directed to produce.

Information about the Adequacy of the Search

For many of the requests made by Ms. Ransome, Ms. Maxwell has indicated that she has been unable to locate any responsive documents. A significant reason may well be due to Ms. Maxwell’s inappropriate limitation of the “relevant period” to just a few months – a subject discussed above. But more broadly, in connection with those responses where documents have not been located (or any otherwise restricted search was done), Ms. Ransome should be provided a description of Ms. Maxwell’s search efforts.

Ms. Ransome raised this point with Ms. Maxwell’s counsel. She received only this terse response back: “In response to your inquiry about our search efforts: Ms. Maxwell and her legal team conducted searches of her paper files, electronic devices, and cloud-based storage, e.g., internet email services.”

Ms. Ransome is entitled to a more fulsome description of the efforts that were made to locate responsive documents. Ms. Maxwell should be directed to explain what search terms were used, what data bases and/or email accounts were searched, how they were searched, and what document preservation efforts were made.

Conclusion

The parties conducted a meet and confer conference call on November 21, 2018. Unfortunately, we have been unable to resolve these discovery issues without the Court’s guidance.

Accordingly, Plaintiff respectfully requests a pre-motion discovery conference pursuant to Local Rule 37.2 and Your Honor’s Individual Practice Rules.

Respectfully submitted,



Paul G. Cassell

cc: All Counsel of Record

From: Paul Cassell <cassellp@law.utah.edu>
Sent: Thursday, November 29, 2018 3:46 PM
To: Aneisha Christie
Subject: FW: meet and confer on Ms. Maxwell's discovery production

From: Paul Cassell
Sent: Wednesday, November 14, 2018 8:07 PM
To: Laura Menninger <lmenninger@hmflaw.com>
Cc: Smccawley@BSFLLP.com; Meredith Schultz <mschultz@bsfllp.com>; Brad Edwards <brad@epllc.com>; Stan Pottinger <Stan@epllc.com>; Brittany Henderson <brittany@epllc.com>; Scott Link <Scott@linkrocklaw.com>; Jeff Pagliuca <jpagliuca@hmflaw.com>; Meredith Schultz <mschultz@bsfllp.com>
Subject: RE: meet and confer on Ms. Maxwell's discovery production

Dear Laura,

I write in connection with your client's, Ms. Maxwell's, recent discovery responses – specifically her responses to my client's, Ms. Ransome's, requests for production. As you know, last week I called you about setting up a call to discuss all this. Due to your schedule, you proposed that this be handled in writing. According, per your suggestion, this email is in the nature of a meet and confer. If you believe that discussing the matter over the phone would be productive in resolving any of the disputes, please let me know and we can quickly set up a call.

We note that you have made a “preliminary statement and general objections” to answering the requests for production. We do not believe that any of these preliminary statements justify the refusals to produce specifically discussed below. Also, with regard to objections to definitions and to instructions, again, we do not believe that they justify any of refusals to produce specifically discussed below.

For several requests, you indicate a concern about a possible privilege log that might extend beyond the requirements of the local civil rule. We are only requesting, where privileged materials exist, a privilege log in compliance with the local rule.

Also, at several points, you raise concerns about privacy and “harassment.” But, as you know, Judge Nesbet has previously entered a protective order in this case, which should obviate concerns about producing financial information and the like.

Issues surrounding the “relevant period” are discussed in the following paragraphs in connection with Document Request No. 1. We believe that the “relevant time period” for all requests (unless otherwise specifically indicated) is September 2006 to the present, as Epstein's sex trafficking enterprise and, later, the coverup associated with the enterprise spans that time period. Accordingly, unless otherwise specifically narrowed, production should be for that entire time period. Indeed, on several requests, we have asked for information earlier than 2006, because of the connection to the Epstein sex trafficking enterprise, which Ms. Maxwell was a part of dating back to around 1999.

Document Request No. 1: A copy of your passport from 2000-2008.

You have refused to produce for the entire nine years described above, indicating that, in your view, the “relevant period” for this case is September 2006 through April 2007. However, Ms. Ransome's complaint

spans a much broader time period. For example, paragraph 14 of the First Amended Complaint (“FAC”) alleges that “Defendant Maxwell was for decades the highest-ranking employee of the Defendants’ sex trafficking venture and enterprise.” And with regard to events following 2007, the First Amended Complaint specifically alleges that (among other things) “In and after May 2007, Defendants actively concealed and covered up what they had done to Plaintiff and other similarly situated females. Defendant’s coverup included efforts to intimidate witnesses who might provide corroborating testimony to Plaintiff as well as destruction of documents and other evidence regarding what they had done.” FAC at ¶ 65. Maxwell’s communications with Epstein “in and after 2007” are directly connected to these allegations in the Complaint.

Judge Koeltl has already recognized the breadth of the allegations in denying a motion to strike a part of the complaint dealing with earlier events:

The portion of the amended complaint subject to the motion to strike provides specific facts in support of the plaintiff’s allegations that she was recruited and enticed into performing sex acts with Epstein as part of a larger enterprise to provide Epstein with young females for sex, in which each defendant allegedly played a specific role. The defendants contend that the plaintiff was a younger woman who willingly accepted the blandishments of a wealthy older man. The knowledge and intent of the defendants will plainly be an issue. The paragraphs of the amended complaint that the defendants seek to strike may be evidence of the defendants’ knowledge and intent in their dealings with the plaintiff. See Federal Rule of Evidence 404(b). Accordingly, the motion to strike is denied.

Transcript (“Tr.”) of Aug. 7, 2018, hearing at 47-48.

In light of the breadth Ms. Ransome’s complaint – and Judge Koeltl’s earlier rulings – you should produce Ms. Maxwell’s passport for the entire requested time period (2000 to 2008).

Document Request No. 2: All documents relating to communications with Jeffrey Epstein from 1999 – present.

You object to production on grounds of undue burden and similar concerns. But given the allegations in the complaint regarding Ms. Maxwell’s deep and pervasive involvement in Epstein’s long-running sex trafficking organization, it is not unduly burdensome to require production of documents concerning communications between Maxwell and Epstein. With regard to alleged privileged materials, a privilege log should be immediately provided. With regard to the relevant time period, the relevant time period is 1999 to present. With regard to events preceding 2006, Judge Koeltl has already specifically ruled on this subject. And with regard to events following 2007, the First Amended Complaint specifically alleges that (among other things) “In and after May 2007, Defendants actively concealed and covered up what they had done to Plaintiff and other similarly situated females. Defendant’s coverup included efforts to intimidate witnesses who might provide corroborating testimony to Plaintiff as well as destruction of documents and other evidence regarding what they had done.” FAC at ¶ 65. Maxwell’s communications with Epstein “in and after 2007” are directly connected to these allegations in the Complaint.

Document Request No. 16: All tax returns and supporting documentation filed by you from 2002-2008.

You object on grounds that this request is “harassing” because, in your view, Ms. Maxwell’s “personal financial information is not at issue in this matter and information relating thereto is irrelevant.” But numerous financial issues are interwoven into this case. For example, as alleged in ¶ 62 of the First Amended Complaint, “Defendants Epstein and Maxwell continued to provide Plaintiff with things of value in exchange for Plaintiff’s continued compliance with Epstein’s sexual demands” Maxwell’s financial ability to provide things of

value is thus directly at issue. In addition, as alleged in ¶ 66 of the First Amended Complaint, “Defendants knowingly benefitted financially and received things of value as a result of coercing and inducing Plaintiff into sexual compliance and otherwise participating in their illegal venture and enterprise.” These things of value may very well appear in income or other entries on Ms. Maxwell’s tax returns.

The “things of value” addressed in the Complaint tie directly into the statutory provisions that Ms. Ransome relies upon. Under 18 U.S.C. § 1591, anyone who “benefits, financially or by receiving *anything of value* from participation in a [sex trafficking] venture” is potentially covered by the statute (emphasis added). Thus, Ms. Maxwell’s receipt (or distribution) of “things of value” may be elements that Ms. Ransome has to prove at trial. Of course, tax returns frequently reflect “things of value.”

Document Request No. 17: All tax returns and supporting documentation filed by you from 2015-2017.

You raise similar objections to those advanced above in connection with this request. But in view of the allegations that Maxwell continued to participate in Epstein’s sex trafficking organization (as alleged in, for example, ¶ 65 of the First Amended Complaint), this information is directly connected to the case.

Document Request No. 19: All documents relating to communications with any named Defendant from January 1, 2000 – present.

You indicate that you are withholding documents outside the “relevant period” – but, as indicated above the relevant period extends more broadly than you maintain. You also indicate you are withholding some documents pursuant to a “common interest agreement.” Please provide the appropriate privilege log for these materials.

Document Request No. 20: All joint defense agreements ever in place between you and any of the other named Defendants.

You indicate that you are withholding documents based on privilege in connection with this request. Please provide the appropriate privilege log for these documents. You also indicate that this request is unduly burdensome, but it is difficult to understand this objection since you appear to have already located the relevant documents.

Document Request No. 21: All common interest agreements ever in place between you and any of the other named Defendants.

You indicate that you are withholding documents based on privilege in connection with this request. What is your basis for claiming such an agreement is privileged? If you have a basis, please provide the appropriate privilege log for these documents. You also indicate that this request is unduly burdensome, but it is difficult to understand this objection since you appear to have already located the relevant documents.

Document Request No. 22: All documents evidencing you having a common interest privilege with any of the other named Defendants.

You indicate that you are withholding documents based on privilege in connection with this request. What is your basis for claiming such evidence is privileged? If you have a basis, please provide the appropriate privilege log for these documents. You also indicate that this request is unduly burdensome, but it is difficult to understand this objection since you appear to have already located the relevant documents.

Document Request No. 23: All documents relating to communications with Alan Dershowitz from 1997–present.

You indicate that this request calls for documents not relevant to this action, but it appears you may intend to call Mr. Dershowitz at the trial in this matter. Accordingly, Dershowitz’s communications with Ms. Maxwell are relevant. You also refer to attorney-work product, so a privilege log is required. Are you claiming a joint defense/common interest agreement? If so information about such subjects is not privileged. With regard to the time frame, the time frame is connected to Epstein’s long-running and on-going sex trafficking enterprise that is at the heart of this case.

Document Request No. 26: All documents relating to communications with any of the following individuals from 1999 – present: Jean Luc Brunel and Nadia Marcinkova.

You indicate that you are withholding documents outside the “relevant period” – but, as indicated above the relevant period extends more broadly than you maintain. With regard to the time frame, the time frame is connected to Epstein’s long-running and on-going sex trafficking enterprise that is at the heart of this case, as well as the subsequent coverup of the activities of that enterprise.

Document Request No. 27: All video tapes, audio tapes, photographs or any other print or electronic media relating to females under the age of 18, who are not family members, from the period of 2000 – present.

You object that this request is unduly broad. But given that Ms. Ransome has alleged Ms. Maxwell’s deep and long-running involvement in a sexual trafficking enterprise that involved trafficking females under the age of 18, this request goes to central issues in this case. It is also not clear why you indicate that you are withholding photographs of “Ms. Maxwell as a child,” as such photographs would fall outside the time period requested. You should produce all documents responsive to this request, as they may tend to demonstrate Ms. Maxwell’s involvement in the sexual trafficking of girls under the age of 18. We are not seeking commercially produced materials that are copyrighted.

Document Request No. 28: All documents relating to your travel from the period of 2000 –present, including but not limited to, any travel on Jeffrey Epstein’s planes, commercial flights, helicopters and records indicating passengers traveling with you, hotel records, and credit card receipts.

It is not clear with you are withholding documents here as privileged, but if so, please provide the appropriate privilege log. You indicate that you are withholding documents outside the “relevant period” – but, as indicated above the relevant period extends more broadly than you maintain. With regard to the time frame, the time frame is connected to Epstein’s long-running and on-going sex trafficking enterprise that is at the heart of this case, as well as the subsequent coverup of the activities of that enterprise.

Document Request No. 29: All documents relating to payments made from Jeffrey Epstein or any related entity to any of the Defendants from 2000 – present, including payments for work performed, gifts, bonuses, vehicles, living expenses, and payments to your charitable endeavors including the TerraMar project.

What materials and/or data did you search? You indicate that you have only searched for documents within the “relevant period” – but, as indicated above the relevant period extends more broadly than you maintain. With regard to the time frame, the time frame is connected to Epstein’s long-running and on-going sex trafficking enterprise that is at the heart of this case, as well as the subsequent coverup of the activities of that enterprise.

Document Request No. 34: All flight logs or passenger manifests for any aircraft owned or controlled by Jeffrey Epstein.

You indicate that you are withholding documents outside the “relevant period” – but, as indicated above the relevant period extends more broadly than you maintain. With regard to the time frame, the time frame is connected to Epstein’s long-running and on-going sex trafficking enterprise that is at the heart of this case, as well as the subsequent coverup of the activities of that enterprise.

Document Request No. 35: All flight logs or passenger manifests for any aircraft owned or controlled by any of the Defendants in this action.

You indicate that you are withholding documents outside the “relevant period” – but, as indicated above the relevant period extends more broadly than you maintain. With regard to the time frame, the time frame is connected to Epstein’s long-running and on-going sex trafficking enterprise that is at the heart of this case, as well as the subsequent coverup of the activities of that enterprise.

Document Request No. 36: All flight logs or passenger manifest for any aircraft owned or controlled by any entity associated with any of the Defendants.

You indicate that you are withholding documents outside the “relevant period” – but, as indicated above the relevant period extends more broadly than you maintain. With regard to the time frame, the time frame is connected to Epstein’s long-running and on-going sex trafficking enterprise that is at the heart of this case, as well as the subsequent coverup of the activities of that enterprise.

Document Request No. 45 All telephone records associated with you, including cell phone records from January 1, 2016 – present.

You indicate that you are withholding documents outside the “relevant period” – but, as indicated above the relevant period extends more broadly than you maintain. With regard to the time frame, the time frame is connected to Epstein’s long-running and on-going sex trafficking enterprise that is at the heart of this case. And with regard to events following 2007, the First Amended Complaint specifically alleges that (among other things) “In and after May 2007, Defendants actively concealed and covered up what they had done to Plaintiff and other similarly situated females. Defendant’s coverup included efforts to intimidate witnesses who might provide corroborating testimony to Plaintiff as well as destruction of documents and other evidence regarding what they had done.” FAC at ¶ 65. Maxwell’s communications with Epstein “in and after 2007” are directly connected to these allegations in the Complaint.

Document Request No. 47 All documents identifying any location you resided or stayed overnight from September 2006-May 2007.

You indicate that you are withholding documents outside the “relevant period” – but, as indicated above the relevant period extends more broadly than you maintain. With regard to the time frame, the time frame is connected to Epstein’s long-running and on-going sex trafficking enterprise that is at the heart of this case, as well as the subsequent coverup of the activities of that enterprise.

Document Request No. 49 All documents relating to contact lists, phone lists or address books

for you or Jeffrey Epstein from 2000 – present.

You indicate that you are withholding documents outside the “relevant period” – but, as indicated above the relevant period extends more broadly than you maintain. With regard to the time frame, the time frame is connected to Epstein’s long-running and on-going sex trafficking enterprise that is at the heart of this case, as well as the subsequent coverup of the activities of that enterprise.

Document Request No. 60 All documents relating to any employee lists or records associated with you, Jeffrey Epstein or any related entity.

You indicate that you are withholding documents outside the “relevant period” – but, as indicated above the relevant period extends more broadly than you maintain. With regard to the time frame, the time frame is connected to Epstein’s long-running and on-going sex trafficking enterprise that is at the heart of this case, as well as the subsequent coverup of the activities of that enterprise.

With regard to “entity,” an entity associated with Ms. Maxwell might be a means for receiving or transmitting “things of value” that are the subject of this litigation, as specifically discussed in the complaint.

Document Request No. 62 All travel records between 2000 and the present reflecting your presence in: (a) Palm Beach, Florida or immediately surrounding areas; (b) 9 E. 71st Street, New York, NY 10021; (c) New Mexico; (d) U.S. Virgin Islands; (e) any jet or aircraft owned or controlled by Jeffrey Epstein.

You indicate that you are withholding documents outside the “relevant period” – but, as indicated above the relevant period extends more broadly than you maintain. With regard to the time frame, the time frame is connected to Epstein’s long-running and on-going sex trafficking enterprise that is at the heart of this case, as well as the subsequent coverup of the activities of that enterprise.

Document Request No. 67 All documents relating to Virginia Giuffre (formerly Virginia Roberts) from 2000 to present.

You indicate that certain materials responsive to this request may be the subject of a court order precluding their production. If so, we are not asking you to violate that court order. With regard to other materials, however, Ms. Giuffre has alleged that Maxwell repeatedly was involved in sexually trafficking her as part Epstein’s sex trafficking enterprise. In particular, Ms. Giuffre alleges that she is a victim of Ms. Maxwell’s and Mr. Epstein’s sex trafficking enterprise. Accordingly, materials about Giuffre are directly relevant to the sex trafficking enterprise at the heart of his case.

Adequacy of the Search

Finally, you have indicated in response to a number of our requests that you were unable to locate any responsive documents. We believe a significant part of this is due to your inappropriate limitation of the “relevant period” to just a few months – a subject discussed above, particularly in our discussion of Request for Production No. 1. In connection with those responses where documents have not been located (or any otherwise restricted search was done), we believe that we are entitled to a description of your search efforts. So what data and/or documents did you search?

I hope that you will agree with our position on these issues, as this would avoid a discovery dispute. Please indicate your position in these issues at your earliest convenience and, in any event, no later November 19, 2018.

Paul Cassell for Sarah Ransome

Paul G. Cassell

Ronald N. Boyce Presidential Professor of Criminal Law and University Distinguished Professor of Law
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You can access my publications on <http://ssrn.com/author=30160>

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From: Laura Menninger <lmenninger@hmflaw.com>

Sent: Tuesday, November 6, 2018 5:55 PM

To: Paul Cassell <cassellp@law.utah.edu>

Cc: Smccawley@BSFLLP.com; Meredith Schultz <mschultz@bsfllp.com>; Brad Edwards <brad@epllc.com>; Stan Pottinger <Stan@epllc.com>; Brittany Henderson <brittany@epllc.com>; Scott Link <Scott@linkrocklaw.com>; Jeff Pagliuca <jpagliuca@hmflaw.com>

Subject: Re: meet and confer on Ms. Maxwell's discovery production

Paul -

Monday is Veteran's Day and I have a number of things already scheduled. Tuesday I'm in a mediation all day and Wednesday we have Mr. Zinoviev's deposition scheduled (pending Scott's trial calendar).

Because of my tight schedule, please just let me know what your concerns are in writing and I will get back to you as soon as possible. If there is anything that can be addressed before the deposition, I will make every effort to do so.

Thanks,
-Laura

On Nov 6, 2018, at 4:27 PM, Paul Cassell <cassellp@law.utah.edu> wrote:

Hi Laura,

Yes, perhaps the Thursday deposition timing is too tight. And you're not available on Friday.

So, what about this coming Monday, Nov. 12? Times that work for us on Monday are 9 AM, 10 AM, 2 PM and 3 PM (mountain).

Paul Cassell for Sarah Ransome

Paul G. Cassell

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From: Laura Menninger <lmenninger@hmflaw.com>
Sent: Tuesday, November 6, 2018 4:16 PM
To: Paul Cassell <cassellp@law.utah.edu>
Cc: Smccawley@BSFLLP.com; Meredith Schultz <mschultz@bsfllp.com>; Brad Edwards <brad@epllc.com>; Stan Pottinger <Stan@epllc.com>; Brittany Henderson <brittany@epllc.com>; Scott Link <Scott@linkrocklaw.com>; Jeff Pagliuca <jpagliuca@hmflaw.com>
Subject: Re: meet and confer on Ms. Maxwell's discovery production

Paul -

I will be with Ms Maxwell in her deposition on Nov 8 unless there is something I'm not aware of. We can try to speak then during a break. If you want to write out your concerns before then and send to me, I would be more prepared to try to work out issues when we speak. I'm not available on Friday.

Thank you,
Laura

On Nov 6, 2018, at 6:06 PM, Paul Cassell <cassellp@law.utah.edu> wrote:

Hi Laura,

Our team has looked at Ms. Maxwell's discovery production and believe there are a number of deficiencies. Is there a convenient time to set up a conference call to meet and confer on this issue? Some times that work for our team are:

Nov. 8 - 9 AM mountain, 10 AM mountain, 1 PM mountain
Nov. 9 - 9 AM mountain, 11 AM mountain, noon mountain, 1 PM mountain

Thanks in advance for giving us times that work, and looking forward to trying to resolve some of these issues.

Paul Cassell for Sarah Ransome

Paul G. Cassell
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