

# **EXHIBIT A**

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

From: Tonja Haddad Coleman [<mailto:tonja@tonjahaddadpa.com>]  
Sent: Tuesday, May 08, 2012 3:07 PM  
To: 'Jack Scarola'  
Cc: Brad Edwards  
Subject: RE: Epstein discovery

Jack:

Thank you for your response. I am sure you are aware that the law permits you to respond to a discovery request by stating that "without waiving the objection" you are producing the documents. However, because I have yet to see the documents, or your privilege log, I cannot possibly agree to anything, much less concede a privilege, as it is my understanding that some of the items to which you are objecting, for example, are electronic communications to/from government entities which, as Mr. Edwards is likely aware from his days as a government attorney, are legally a matter of public record, will not, in fact, be privileged under any theory. That being said, kindly send what you have and if we still deem it non-responsive, in non-compliance with the Court's order, or otherwise not subject to any privilege, we can take it up with the Judge. Thank you.

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