

EXHIBIT K

BOIES, SCHILLER & FLEXNER LLP

401 EAST LAS OLAS BOULEVARD • SUITE 1200 • FORT LAUDERDALE, FL 33301-2211 • PH. 954.356.0011 • FAX 954.356.0022

Sigrid S. McCawley, Esq.
E-mail: smccawley@bsfllp.com

June 10, 2016

VIA E-MAIL

Laura A. Menninger, Esq.
HADDON, MORGAN AND FOREMAN, P.C.
150 East 10th Avenue
Denver, Colorado 80203
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

Hi Jenna,

My suggestion is for you to do a Freedom of Information Act request (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 Ron Eppinger. 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: Robert Giuffre [<mailto:robiejennag@icloud.com>]
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 Ron Eppinger? 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: "robiejennag@icloud.com"
Subject: Re: Hi There
Date: Wednesday, August 27, 2014 10:50:27 AM

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

Jason

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

From: Robert Giuffre <robiejennag@icloud.com>
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) 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 Ron Eppinger. 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: Robert Giuffre [<mailto:robiejennag@icloud.com>]

> 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 Ron Eppinger? 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: [Robert Giuffre](#)
To: Jason.Richards2@ic.fbi.gov
Subject: Virginia Roberts(Jane doe 102)
Date: Tuesday, April 15, 2014 9:50:31 AM

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 321-271-4948

Sent from my iPhone

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

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
321-271-4948 cell

Sent from my iPhone

GIUFFRE005611
CONFIDENTIAL

From: 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

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
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
Subject: Victims Refuse Silence
Date: Wednesday, March 18, 2015 12:19:06 PM

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,robiejennag@y7mail.com | | 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 | robiejennag@y7mail.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 |
| 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 | robiejennag@y7mail.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 |
| 7 | 2/21/2015 16:45 | Sigrid McCawley | StanPottinger@aol.com,brad@pathtojustice.com,cassellp@law.utah.edu,robiejennag@y7mail.com | Smccawley@BSFLLP.com | Discussion of evidence among client and attorneys | AC Privilege and Work Product/joint defense/common interest | Withheld | 2 | msg |

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

| 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,robiejennag@y7mail.com | 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 | robiejennag@y7mail.com | | 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 | robiejennag@y7mail.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 |
| 13 | 2/23/2015 14:29 | StanPottinger@aol.com | Smccawley@BSFLLP.com,robiejennag@y7mail.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 |
| 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 |

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|--------|-----------------|------------------|------------------------|---|--|---|------------------|------------|----------|
| 15 | 2/24/2015 17:51 | Sigrid McCawley | robiejennag@y7mail.com | | 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 | jiff |
| 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 | robiejennag@y7mail.com | Smccawley@BSFLLP.com,brad@pa thtojustice.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 |

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

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|--------|-----------------|-----------------------|--|---|--|---|------------------|------------|----------|
| 22 | 3/13/2015 17:56 | StanPottinger@aol.com | robiejennag@y7mail.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,robiejennag@y7mail.com | 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 | robiejennag@y7mail.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 |
| 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 |

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

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|--------|-----------------|------------------|---|--|--|--|------------------|------------|----------|
| 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,robiejennag@y7mail.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 |
| 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,robiejennag@y7mail.com,stanpottinger@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 | robiejennag@y7mail.com | | 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 | robiejennag@y7mail.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 |

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

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|--------|-----------------|------------------|---|---|--|--|------------------|------------|----------|
| 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,robiejennag@y7mail.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 |
| 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 | robiejennag@y7mail.com | Smccawley@BSFLLP.com,StanPottinger@aol.com,brad@pathtojustice.com,brittany@pathtojustice.com,perez@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 | robiejennag@y7mail.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 |

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

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|--------|-----------------|--------------------|------------------------|--|---|---|------------------|------------|----------|
| 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 | robiejennag@y7mail.com | 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 | robiejennag@y7mail.com | 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 |

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

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|--------|-----------------|------------------|---|--|--|---|------------------|------------|----------|
| 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,robiejennag@y7mail.com | 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 | robiejennag@y7mail.com | 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 | robiejennag@y7mail.com | | 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 | robiejennag@y7mail.com | | Conveying legal advice re draft legal documents to client, with attachments | AC Privilege and Work Product/joint defense/common interest | Withheld | 1 | msg |

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

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|--------|-----------------|------------------|------------------------|---|--|---|------------------|------------|----------|
| 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 | robiejennag@y7mail.com | StanPottinger@aol.com,brad@pathtojustice.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 | robiejennag@y7mail.com | StanPottinger@aol.com,brad@pathtojustice.com,brittany@pathtojustice.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 |

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

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| 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 | robiejennag@y7mail.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 |
| 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 | robiejennag@y7mail.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 |

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|--------|-----------------|------------------|--|--|--|---|------------------|------------|----------|
| 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 | robiejennag@y7mail.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 |
| 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 | robiejennag@y7mail.com | StanPottinger@aol.com,brad@pathjustice.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@pathjustice.com,robiejennag@y7mail.com,stanpottinger@aol.com | | Providing legal advice related to VRS | Attorney Client/joint defense/common interest/work product | Withheld | 1 | msg |

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

| 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 | robiejennag@y7mail.com | | 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 | robiejennag@y7mail.com | | 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 | robiejennag@y7mail.com | Smccawley@BSFLLP.com | Seeking information to assist in providing legal advice | Attorney Client/joint defense/common interest/work product | Withheld | 1 | msg |

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

| 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,robiejennag@y7mail.com | 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 | robiejennag@y7mail.com | | 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 | robiejennag@y7mail.com | 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 | robiejennag@y7mail.com | | Email chain with Giuffre and McCawley re case research, with attachment | AC Privilege and Work Product/joint defense/common interest | Withheld | 2 | msg |

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

| 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,robiejennag@y7mail.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 | 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 | robiejennag@y7mail.com | | 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 | robiejennag@y7mail.com | | 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 |

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

| 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 | jff |
| 93 | | | | | Attached confidential agreement page | Attorney Client/joint defense/common interest/work product | Withheld | 1 | jff |
| 94 | 6/5/2015 19:16 | Sigrid McCawley | robiejennag@y7mail.com | | 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 | robiejennag@y7mail.com | | 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 | robiejennag@y7mail.com | 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 |

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

| 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 | robiejennag@y7mail.com | 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 | robiejennag@y7mail.com | | 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 | robiejennag@y7mail.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 |
| 102 | 8/6/2015 2:45 | Sigrid McCawley | robiejennag@y7mail.com | 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 | robiejennag@y7mail.com | 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 |

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

| 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 | robiejennag@y7mail.com | 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@bsflp.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, robiejennag@y7mail.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 |

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

| 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 | robiejennag@y7mail.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 |
| 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 | robiejennag@y7mail.com | 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 | robiejennag@y7mail.com | | Email chain with Giuffre and McCawley re potential legal action. | Attorney Client/joint defense/common interest/work product | Withheld | 2 | msg |

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

| 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 | robiejennag@y7mail.com | | 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 |

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

| 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 | |

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

| 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 | | 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. | AC Privilege and Work Product/joint defense/communication 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 | | 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. Alan Dershowitz</i> ("Dershowitz case"), Case no. 15-000072, 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 Dershowitz case, communications from the attorneys to Ms. Giuffre giving legal advice or giving attorney mental impressions related to the Dershowitz case, communications sending or attaching attorney work product related to the Dershowitz case, and/or communications sending or attaching client revisions to attorney work product related to the Dershowitz case, and communications re evidence. | AC Privilege and Work Product/joint defense/communication 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 | | 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. | AC Privilege and Work Product/joint defense/commo n interest | Withheld | Approx. 1.3K docs overlapping with other cases | |
| 129 | 6/10/2015 | Virginia Giuffre | robiejennag@y7mail.com | | 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@pa thtojustice.com,robiejennag@y7mail.com | 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@pa thtojustice.com,garvin@lclark.edu,robiejennag@y7mail.com | 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@pa thtojustice.com,garvin@lclark.edu,robiejennag@y7mail.com | Communication re legal advice re VRS communications. | AC Privilege and Work Product | Withheld | 1 | msg |

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

| 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,robiejennag@y7mail.com | 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,robiejennag@y7mail.com | 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,robiejennag@y7mail.com | 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 | robiejennag@y7mail.com | | Email chain with Giuffre and McCawley re non-testifying expert. | Attorney Client | Withheld | 1 | msg |
| 138 | 2/26/2015 | Sigrid McCawley | robiejennag@y7mail.com | | Communication re non-testifying expert. | Attorney Client | Withheld | 1 | msg |
| 139 | 2/11/2016 | Sigrid McCawley | robiejennag@y7mail.com | | 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,robiejennag@y7mail.com | 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 | robiejennag@y7mail.com | 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 | robiejennag@y7mail.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 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 | robiejennag@y7mail.com | | 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 | 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 |

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

| 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 | |

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016

| 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 |

Plaintiff Virginia Giuffre's Revised Supplemental Privilege Log dated June 9, 2016