

Exhibit A

From: Sandra Perkins
Sent: Thursday, April 27, 2017 4:12 PM
To: 'Maya_H_Nuland@nysd.uscourts.gov'
Cc: 'SweetNYSDChambers@nysd.uscourts.gov'
Subject: RE: Giuffre v. Maxwell, Case No: 15-cv-07433-RWS
Attachments: 2017.04.03 Defts Amended Objs to Ptf's Depo Desgs.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Maya,

See attached, in an abundance of caution, I just double checked the docket and there appears to be a late submission by Defendant [DE 826] which doesn't appear to be on the binder index. Attached is what I found in the unredacted e-mail distribution for this date.

I believe you should now have everything you need. Please do not hesitate to contact me should you need anything further.
Sandra

From: Maya_H_Nuland@nysd.uscourts.gov [mailto:Maya_H_Nuland@nysd.uscourts.gov]
Sent: Thursday, April 27, 2017 3:56 PM
To: Sandra Perkins
Cc: SweetNYSDChambers@nysd.uscourts.gov
Subject: RE: Giuffre v. Maxwell, Case No: 15-cv-07433-RWS

That is very helpful, thank you. I just want to make sure that there is nothing MISSING from the Binder that the Judge needs to rule on.

Maya Nuland
Law Clerk to the Honorable Robert W. Sweet
United States District Court for the Southern District of New York
500 Pearl Street, Suite 1940
New York, NY 10007-1312
(212) 805-0463

From: Sandra Perkins <sperkins@BSFLLP.com>
To: "SweetNYSDChambers@nysd.uscourts.gov" <SweetNYSDChambers@nysd.uscourts.gov>
Cc: "Maya_H_Nuland@nysd.uscourts.gov" <Maya_H_Nuland@nysd.uscourts.gov>
Date: 04/27/2017 03:51 PM
Subject: RE: Giuffre v. Maxwell, Case No: 15-cv-07433-RWS

Maya, I hope this answers your question. There should be 10 items in the binder (which are both Plaintiff and Defendant submissions). However, the attached word versions relate to Plaintiff's submissions and should correspond to the binder tabs 1, 3, 6, 7, 9 and 10.

Please let me know if the binder has less than 10 items in it (or if there is anything missing) as it was assembled for us

in our NY office so I was unable to put eyes on it before it was delivered.

Thank you and I apologize for any confusion,
Sandra

01-13-2017 Plaintiff's Deposition Designations.....	1
01-27-2017 Plaintiff's Objections AND Cross Designations.....	3
02-06-2017 Plaintiff's Supplemental Designations (Kellen/Marcinkova).....	6
02-17-2017 Plaintiff's Objections to Defendant's Counter Designations.....	7
03-28-2017 Response to Defendant's Objections to Plaintiff's Designations.....	9
03-28-2017 Notice of filing Typographical Errors.....	10

From: Maya_H_Nuland@nysd.uscourts.gov [mailto:Maya_H_Nuland@nysd.uscourts.gov] **On Behalf Of**
SweetNYSDChambers@nysd.uscourts.gov
Sent: Thursday, April 27, 2017 3:40 PM
To: Sandra Perkins
Cc: SweetNYSDChambers@nysd.uscourts.gov
Subject: Re: Giuffre v. Maxwell, Case No: 15-cv-07433-RWS

Thank you, Sandra. So which of these documents are what was in the binder? Since we received the binders on April 5, I understood that to contain the final versions of all of the deposition designations and objections to designations, incorporating all amendments, etc.

Sandra Perkins <sp Perkins@BSFLLP.com>

04/27/2017 01:37 PM

To "SweetNYSDChambers@nysd.uscourts.gov" <SweetNYSDChambers@nysd.uscourts.gov>
cc "Maya_H_Nuland@nysd.uscourts.gov" <Maya_H_Nuland@nysd.uscourts.gov>
Subject Giuffre v. Maxwell, Case No: 15-cv-07433-RWS

To the honorable Judge Sweet,

As a follow up to Maya Nuland's phone call request today, please see the below list of what should in the designations binder submitted to the Court, along with the word versions of Plaintiff's submissions (highlighted below). For the Court's convenience, I have also included a word document for "Tab 2 - Defendant's Deposition Designations (charted by BSF)" which was charted by BSF due to Defendant's 1/13/17 submission being received in highlighted transcript form.

Please feel free to contact me should you have any questions or need any additional information.

DEPOSITION DESIGNATIONS, COUNTER DESIGNATIONS & OBJECTIONS

TAB

01-13-2017 Plaintiff's Deposition Designations.....	1
01-13-2017 Defendant's Deposition Designations (Charted by BSF).....	2
01-27-2017 Plaintiff's Objections AND Cross Designations.....	3
01-27-2017 Defendant's Objections to Plaintiff's Deposition Designations.....	4
02-03-2017 Defendant's Counter-Designations to Plaintiff's Deposition Designations.....	5
02-06-2017 Plaintiff's Supplemental Designations (Kellen/Marcinkova).....	6
02-17-2017 Plaintiff's Objections to Defendant's Counter Designations.....	7
02-17-2017 Defendant's Objections to Plaintiff's Cross Designations.....	8
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Kindest Regards,

Sandra Perkins Borger
Paralegal

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