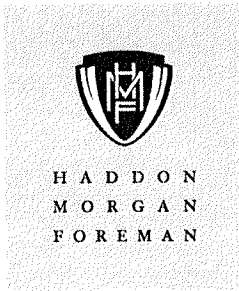


# **EXHIBIT A**



Haddon, Morgan and Foreman, P.C.  
Laura A. Menninger

150 East 10th Avenue  
Denver, Colorado 80203  
PH 303.831.7364 FX 303.832.2628  
www.hmflaw.com

March 14, 2016

**VIA EMAIL**

Sigrid S. McCawley, Esq.  
Bois, Schiller & Flexner LLP  
401 East Las Olas Boulevard, Suite 1200  
Fort Lauderdale, FL 33301

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

Dear Ms. McCawley:

I write in response to your letter dated March 10, 2016 concerning your proposed Stipulation relating to the production of electronically stored information ("ESI"). While I agree that it will be mutually beneficial to both parties to stipulate to a form of production going forward, I do not believe that the form you proposed is appropriate for this matter.

Notably, the Stipulation you propose contemplates the identification of custodians and sources of documents from which the parties will be collecting ESI. This is an action involving two individuals, not entities, and thus each party has but one custodian—themselves. Further, again because both parties are individuals, rather than large, sophisticated entities with information technology professionals on staff, many of your requirements concerning the format for produced documents are unnecessarily burdensome.

In the interest in reaching a reasonable agreement, I propose that the parties meet and confer regarding appropriate search terms to be used when collecting documents. I would also agree to produce e-mail documents in single-page TIFF format and to produce non-email documents such as Excel spreadsheets in a manner that is easily reviewable. Further, I would agree to make best efforts to de-duplicate ESI. Lastly, the clawback provision you proposed is acceptable. Beyond these concessions I do not agree to your proposed Stipulation.

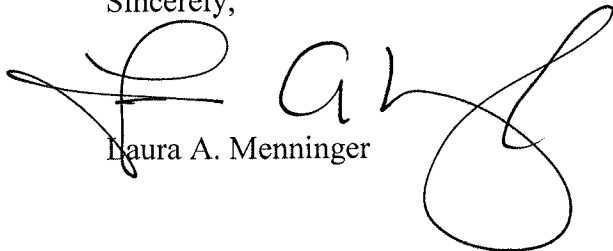
Please let me know if the counter-proposal submitted herein is acceptable.

Sigrid S. McCawley, Esq.

March 14, 2016

Page 2

Sincerely,

A handwritten signature in black ink, appearing to read "Laura A. Menninger". The signature is stylized with large, flowing loops and a prominent "L" at the beginning.

Laura A. Menninger