

EXHIBIT 1

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March 28, 2016

VIA E-MAIL

Laura A. Menninger, Esq.
Jeffrey Pagliuca, Esq.
HADDON, MORGAN AND FOREMAN, P.C.
150 East 10th Avenue
Dever, Colorado 80203
lmenninger@hmflaw.com

Re: *Guiffre v. Maxwell*
Case No. 15-cv-07433-RWS

Dear Ms. Menninger and Mr. Pagliuca,

Pursuant to the Court's Order in the above-styled case, we request that you produce documents as directed by the Court at the hearing on March 17, 2016. As you know, we originally served out discovery requests on October 27, 2015. Therefore, we believe a reasonable time period for production of the documents is twenty (20) days from the Court's ruling which would be by April 6, 2016. *See* March 17, 2016, Hearing Transcript at p. 30-33.

We also request that you provide the search terms, if any, you used for your search of electronically stored information, and we request that you describe your processes in collecting and preserving such information.

Please let me know if you have any questions.

Sincerely,



Sigrid S. McCawley

SSM:ms
Enclosures