# **EXHIBIT G**

### Case 1:15-cv-07433-LAP Document 156-7 Filed 05/20/16 Page 2 of 6 Unidentified "Professionals"

Log	Email Sent						Privilege	Page	Doc
ID	Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Count	Туре
					Plaintiff has objected that Defendant's requests				1
					are overly broad and unduly burdensome, as				1
					individually logging all privileged responsive				1
					documents would be overly burdensome. Plaintiff				1
					contends that requests targeting such privileged				1
					information are not reasonably calculated to lead				1
					to the discovery of admissible evidence, are not				1
					important to resolving the issues, are not relevant				1
					to any party's claim or defense, are not				1
					proportional to the needs of the case, and creates				1
					a heavy burden on Plaintiff that outweighs its				1
					benefit. Therefore, Plaintiff has employed				1
					categorical logging pursuant to Local Civil Rule				1
					26.2(c). Correspondence re: Jane Doe #1 and Jane				1
					Doe #2 v. United States ("CVRA case"), Case no. 08-				1
					80736-CIV-Marra, pending in the Southern District				1
		Virginia Giuffre, Brad			of Florida. Documents withheld pursuant to the				1
		Edwards, Paul Cassell,	Virginia Giuffre, Brad		privileges asserted included communications from				1
		Brittany Henderson (and	Edwards, Paul Cassell,		Ms. Giuffre to the attorneys listed seeking legal				1
		other , Sigrid McCawley,	Brittany Henderson, Sigrid		advice related to the CVRA case, communications				1
		Meredith Schultz, David	McCawley, Meredith		from the attorneys to Ms. Giuffre giving legal			Appro	
	Emails,	Boies, Jack Scarola, Stan	Schultz, David Boies, Jack		advice or giving attorney mental impressions			x. 1.3K	1
	letters, and	Pottinger, Ellen Brockman,	Scarola, Stan Pottinger,		related to the CVRA case, communications sending			docs	İ
	other	Legal Assistants,	Ellen Brockman, Legal		or attaching attorney work product related to the			overla	1
	communicat	Professionals retained by	Assistants, Professionals		CVRA case, and/or communications sending or	AC Privilege and		pping	1
	ions from	attorneys to aid in the	retained by attorneys to aid		attaching client revisions to attorney work product	Work Product/joint		with	ĺ
	2011 -	rendition of legal advice	in the rendition of legal		related to the CVRA case, and communications re	defense/common		other	ĺ
125	Present	and representation	advice and representation		evidence.	interest	Withheld	cases	

### Case 1:15-cv-07433-LAP Document 156-7 Filed 05/20/16 Page 3 of 6 Unidentified "Professionals"

Log	Email Sent						Privilege	Page	Doc
ID	Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Count	Туре
		Virginia Giuffre, Brad	Virginia Giuffre, Brad	ec Address	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	Type of Thinlege	Action	Count	Турс
		Brittany Henderson, Sigrid			included communications from Ms. Giuffre to the				
		McCawley, Meredith	Brittany Henderson, Sigrid		attorneys listed seeking legal advice related to the				
		Schultz, David Boies,	McCawley, Meredith		Maxwell case, communications from the attorneys			Appro	
	,	Stephen Zach, Stan	Schultz, David Boies,		to Ms. Giuffre giving legal advice or giving attorney			x. 1.3K	
	,	Pottinger, Ellen Brockman,	' '		mental impressions related to the Maxwell case,			docs	
		Legal Assistants,	Pottinger, Ellen Brockman,		communications sending or attaching attorney	A.C. Duivillaga and		overla	
		Professionals retained by	Legal Assistants,		work product related to the Maxwell case, and/or	· ·		pping	
		attorneys to aid in the	Professionals retained by		9	Work Product/joint		with	
	1 -	rendition of legal advice	attorneys to aid in the		• •	defense/common		other	
126	Present	and representation	rendition of legal advice and		Maxwell case, and communications re evidence.	interest	Withheld	cases	

### Case 1:15-cv-07433-LAP Document 156-7 Filed 05/20/16 Page 4 of 6 Unidentified "Professionals"

Log	Email Sent						Privilege	Page	Doc
ID	Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Count	Туре
		Virginia Giuffre, Brad	Elitali 10	CC Address	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: Bradley Edwards and Paul Cassell v. Alan Dershowitz("Dershowitz case"), Case no. 15000072, pending in the Seventeenth Judicial Circuit, Broward County, Florida. Documents withheld pursuant to the	5	Action	Count	Турс
1			Virginia Giuffre, Brad		privileges asserted included communications from				
		Brittany Henderson, Sigrid			Ms. Giuffre to the attorneys listed seeking legal				
		McCawley, Meredith Schultz, David Boies,	Brittany Henderson, Sigrid McCawley, Meredith		advice related to the Dershowitz case, communications from the attorneys to Ms. Giuffre			Appro	
		Stephen Zach, Stan	Schultz, David Boies,		giving legal advice or giving attorney mental			ж. 1.3K	
	,	Pottinger, Ellen Brockman,	, ,		impressions related to the Dershowitz case,			docs	
		Legal Assistants,	Pottinger, Ellen Brockman,		communications sending or attaching attorney			overla	
		Professionals retained by	Legal Assistants,		work product related to the Dershowitz case,	AC Privilege and		pping	
		attorneys to aid in the	Professionals retained by		· ·	Work Product/joint		with	
	2015 -	rendition of legal advice	attorneys to aid in the		client revisions to attorney work product related	defense/common		other	
127	Present	and representation	rendition of legal advice and		to the Dershowitz case, and communications re	interest	Withheld	cases	

### Case 1:15-cv-07433-LAP Document 156-7 Filed 05/20/16 Page 5 of 6 Unidentified "Professionals"

Log	Email Sent						Privilege	Page	Doc
ID	Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Count	Туре
					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 No. 102 v.				
					Jeffrey Epstein("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				
		Virginia Giuffre, Bob			the attorneys to Ms. Giuffre giving legal advice or			Appro	
	Emails,	Josefsberg, Katherine W.			giving attorney mental impressions related to the			x. 1.3K	
	letters, and	Ezell, Amy Ederi, other			Epstein case, communications sending or			docs	
	other	Podhurst attorneys, Legal			attaching attorney work product related to the			overla	
	communicat	Assistants, and			Epstein case, and/or communications sending or	AC Privilege and		pping	
	ions from	Professionals retained by			attaching client revisions to attorney work product	Work Product/joint		with	
	2009 -	attorneys to aid in the			related to the Epstein case, and communications	defense/common		other	
128	Present	rendition of legal advice			re evidence.	interest	Withheld	cases	

## Case 1:15-cv-07433-LAP Document 156-7 Filed 05/20/16 Page 6 of 6 Unidentified "Professionals"

Log	Email Sent						Privilege	Page	Doc
ID	Date	Email From	Email To	CC Address	Subject Matter	Type of Privilege	Action	Count	Type
				ec / wares	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 Rule26.2(c). This categorical entry is regarding correspondencere potential legal action against entities and individuals. Documents withheld	5		Godine	,,,,,
		Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson, Sigrid	Virginia Giuffre, Brad Edwards, Paul Cassell, Brittany Henderson, Sigrid		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.				
		McCawley, Meredith	McCawley, Meredith		Giuffre giving legal advice or giving attorney				
	letters, and	Schultz, David Boies,	Schultz, David Boies,		mental impressions related to the law suits,			Appro	
	other	Stephen Zach, Stan	Stephen Zach, Stan		communications sending or attaching attorney			x. 1.3K	
	communicat	Pottinger, Ellen Brockman,	Pottinger, Ellen Brockman,		work product related to potential lawsuits, and/or			overla	
	ions from	Legal Assistants,	Legal Assistants,		communications sending orattaching client	AC Privilege and		pping	
	January	Professionals retained by	Professionals retained by		revisions to attorney work product relatedto	Work Product/joint		with	
	2015 -	attorneys to aid in the	attorneys to aid in the		potential lawsuits, and communications re	defense/common		other	
152	Present	rendition of legal advice	rendition of legal advice		evidence.	interest	Withheld	cases	