

EXHIBIT A



HADDON
MORGAN
FOREMAN

Haddon, Morgan and Foreman, P.C.
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July 6, 2017

VIA EMAIL

Sigrid McCawley
Boies, Schiller & Flexner LLP
401 East Las Olas Blvd., Suite 1200
Fort Lauderdale, FL 33301
smccawley@bsflp.com

Re: *Giuffre v. Maxwell*, 15-cv-07433-RWS

Dear Sigrid:

I am writing to confer with you regarding the handling of "Confidential" materials from the *Giuffre v. Maxwell* matter.

Specifically, pursuant to paragraph 12 of the Protective Order, at the conclusion of the case, "each document and all copies thereof which have been designated as CONFIDENTIAL shall be returned to the party that designated it CONFIDENTIAL, or the parties may elect to destroy CONFIDENTIAL documents," whereupon an affidavit confirming destruction must be provided.

I am writing to propose that the parties mutually agree to the following process for joint compliance with Paragraph 12:

- Each party will destroy all documents (and all copies of such documents) designated CONFIDENTIAL by the opposing counsel and certify via affidavit to the same. With regard to counsel from your side, that would mean an affidavit from each law firm representing Ms. Giuffre (including Messrs. Cassell and Pottinger, along with Boies Schiller and Farmer Jaffe).
- With respect to deposition transcripts, the party who noticed the deposition (all of which were designated CONFIDENTIAL) will undertake to obtain certification from the court reporters as to the destruction of all copies of the deposition transcripts and exhibits thereto.

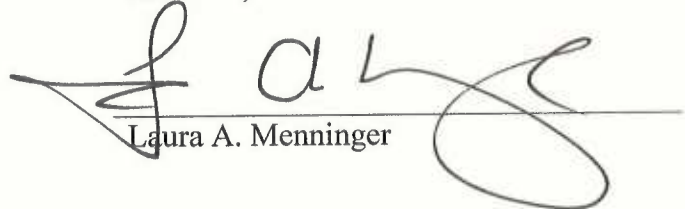
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- As to any individual to whom CONFIDENTIAL information was shared pursuant to Paragraph 6 (and from whom there must be a written acknowledgment of their willingness to abide by the Protective Order):
 - The attorney who shared the CONFIDENTIAL information will obtain from such individual an affidavit that all copies of such CONFIDENTIAL information have been destroyed;
 - The attorney who shared the CONFIDENTIAL information with the witness will (a) maintain the individual's written acknowledgment to be bound and affidavit of destruction in that attorney's files, and (b) include in that attorney's affidavit of compliance a certification that all such individuals have supplied the appropriate affidavits of destruction.
- Both parties will endeavor to complete this process, and exchange affidavits of compliance, by July 31, 2017.

Please let me know if this process is agreeable to you.

Thank you,

HADDON, MORGAN AND FOREMAN, P.C.



Laura A. Menninger

Cc: Bradley J. Edwards
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Paul G. Cassell
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J. Stanley Pottinger
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