

# **EXHIBIT B**



Haddon, Morgan and Foreman, P.C.  
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April 25, 2016

**VIA EMAIL**

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

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

Sigrid,

Based on the Court's rulings on April 21<sup>st</sup>, and your client's deposition on May 3<sup>rd</sup>, please provide the following documents on or before April 27<sup>th</sup>, 2016.

- All documents withheld on the basis of the "public interest privilege," other than Plaintiff's actual statements to any law enforcement agency, which are to be submitted for *in camera* review forthwith. *See* Resp. to RFPs 1, 2, 3, 5, 9, 10, 12, 13, 15, 18, 19, 27, 28, 35, 36, 37; Plaintiff's Amended Privilege Log.
- All fee agreements, retainer agreements, and letters of engagement for any attorney listed on Plaintiff's privilege log and "Identification Information from Privilege Log for Plaintiff's First Production." *See* Resp. to RFP 4.
- Ms. Giuffre's deposition testimony in the *Cassell & Edwards v. Dershowitz*, including any errata and the transmission correspondence concerning any such errata. *See* Resp. to RFP 27, 34.
- All of Plaintiff's medical records for the period 1999-present. *See* Interrog. 12, Ex A; Resp. to RFP 1, 26.
- All of Plaintiff's tax returns for the period 1999 – present. *See* Resp. to RFP 14.
- All of Plaintiff's school records from 1998 – present. *See* Resp. to RFP 15.

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- All of Plaintiff's employment records from 1996 – present. *See* Resp. to RFP 1, 2, 10, 12, 24.

Likewise, please provide no later than April 29<sup>th</sup> Ms. Giuffre's responses to the following interrogatories, as directed by the Court:

- Plaintiff's residences, with actual dates of residency. Interrog. 1.
- Plaintiff's attorneys, the dates of their representations, and the nature of their representations. Interrog. 3.
- Plaintiff and her attorneys' communications with law enforcement, including the dates of the communications and the parties to the communication. Interrog. 4.
- Plaintiff's employment from 1996 – present, including the dates of the employment, the address and telephone number for the employers, job titles and income from such employer. Interrog. 9.
- Plaintiff's health care providers from 1999 – present, including their name, address, telephone number, and dates of any treatment. Interrog. 12. As that interrogatory directs, please provide releases for any such health care provider.

As you know, we originally requested the records concerning Plaintiff's employment, education, income, tax returns and medical records on February 12, 2016, and to date, you have provided almost none. Last week, I asked you to have your client sign releases for these records and you have not. In Court, you also seemed to be unaware of many of Plaintiff's health care providers, and therefore, I am skeptical that you have actually obtained releases from your client and forwarded them to the appropriate entities for copies of their records.

Therefore, to be clear, we are entitled to records from *at least* the following entities:

1. U.S. IRS – tax returns from 1999-present.
2. Australian taxing authorities – tax returns from 1999-present.
3. Employment records:
  - a. Mar-A-Lago Resort and Spa
  - b. Roadhouse Grill
  - c. Manpower Logistics
  - d. Employment Training and Recruitment Australia
  - e. Indigo Bar & Grill

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- f. Gemma Catering / Wedding Receptions
  - g. Mannway Logistics
  - h. Calmao Flamenco Bar & Restaurant
- 4. Education records:
  - a. Crestwood Middle School
  - b. Royal Palm Beach Community High School
  - c. Forest Hill High School
  - d. Survivors Charter School
- 5. Medical records:
  - a. Dr. Karen Kutikoff
  - b. Wellington Imaging Associates, PA
  - c. Mona Devanesan, M.D.
  - d. Growing Together

As to each entity, and any others that you identify, please provide proof that you have submitted a release, including proof of the date on which such request was made. Alternatively, provide a signed release from your client by Friday, April 29, 2016 to us so that we may obtain the records independently.

Sincerely,

HADDON, MORGAN AND FOREMAN, P.C.

/s/ Laura A. Menninger  
Laura A. Menninger