

# EXHIBIT A

**Barak Bacharach**

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**From:** Steven Sheffield <steven.sheffield@prs-analytics.com>  
**Sent:** Tuesday, May 16, 2023 8:16 AM  
**To:** Barak Bacharach  
**Cc:** andrew.mincin@ranenetwork.com; david.lawrence@ranenetwork.com; Justin Cabanas; Maurice Ross; Randall L. Rasey  
**Subject:** Re: Sheffield Report of 1/28/2020 - Reviews and Charts

1. Where are we in determining whether we have the reviews underlying the report? Opposing counsel has said that he is close to filing a motion to compel if we cannot given him a firm date for either producing the reviews or affirmatively stating we do not have them in our possession, so please let me know where we are on this ASAP.

In late 2019, the works delivered in January of 2020 were contracted to Dunami Inc. The analyses were conducted by a data analyst named Jake K. I was both aware of and consulted on his work. Because of the sensitive nature of the work, all data was stored locally on his hard drive and password protected. As we have sought to determine the status of this data I have consulted with Jake. He does not have the laptop in his possession nor does he retain any data from his time at Dunami Inc. In pursuing this data I have consulted with Pat Butler, CEO of the now defunct Dunami. In late 2020, Dunami was purchased by BabelStreet. All Dunami assets are retained in one of two places, the BabelStreet Kansas City office or with Mr Tim C in Colorado Springs. Jake Kambourians old laptop is not in either location. I have chatted with both Pat and Tim and they believe Jake's laptop was among the computers that were scrapped during the acquisition. Additionally, Pat and I have both looked at the cloud backups held on Sync. The data does not exist there. The former Dunami, nor any of its analysts, retain this data.

The offending posts were deleted from public view, most likely by the users that created it. The only way to recreate the reports and data is to subpoena the original posts from backups the platforms maintain. If that condition is met, I can apply the techniques that were employed by Jake K to validate and recreate his analysis.

2. Similarly, opposing counsel has requested the natives of all the charts in the report. By my count, there are 6 charts in the report. Can you provide us with those we can produce them to opposing counsel?

Just like the data, the original graphs were lost in the merger between Dunami and BabelStreet in 2020.

On Thu, May 11, 2023 at 4:43 PM Barak Bacharach <[bbacharach@bartonesq.com](mailto:bbacharach@bartonesq.com)> wrote:

Gentlemen,

I am emailing you with two queries related to Mr. Sheffield's report of January 28, 2020.

1. Where are we in determining whether we have the reviews underlying the report? Opposing counsel has said that he is close to filing a motion to compel if we cannot given him a firm date for either producing the reviews or affirmatively stating we do not have them in our possession, so please let me know where we are on this ASAP.

2. Similarly, opposing counsel has requested the natives of all the charts in the report. By my count, there are 6 charts in the report. Can you provide us with those we can produce them to opposing counsel?

Thank you,

**Barak Bacharach**

Associate

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Steven Sheffield  
Analytic Director

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