

**Exhibit A**  
**Plaintiff's Position on Docket Entries 143, 164, 172, 199, & 230**

Docket Entry	Plaintiff's Position
<b>143: Plaintiff's Motion to Compel Defendant to Answer Deposition Questions</b>	<ul style="list-style-type: none"> <li>• Unseal with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>144</b>	<ul style="list-style-type: none"> <li>• Unseal in full (no applicable <i>Brown</i> minimal redactions or yet-to-be-noticed Non-Party names)</li> </ul>
<b>144-1</b>	<ul style="list-style-type: none"> <li>• Unseal with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>144-2</b>	<ul style="list-style-type: none"> <li>• Unseal with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>144-4</b>	<ul style="list-style-type: none"> <li>• Unseal with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>144-5</b>	<ul style="list-style-type: none"> <li>• Unseal with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>144-6</b>	<ul style="list-style-type: none"> <li>• Unseal with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>144-7</b>	<ul style="list-style-type: none"> <li>• Unseal with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>149</b>	<ul style="list-style-type: none"> <li>• Unseal with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>150</b>	<ul style="list-style-type: none"> <li>• Unseal in its entirety (no applicable <i>Brown</i> minimal redactions or yet-to-be-noticed Non-Parties)</li> </ul>
<b>150-1</b>	<ul style="list-style-type: none"> <li>• Unseal pages released by Second Circuit (<i>see</i> List of Decided Motions)</li> <li>• Unseal remainder of the document with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>152</b>	<ul style="list-style-type: none"> <li>• Unseal portions summarizing Doe 1's public statements (pg. 6)</li> <li>• Unseal portions summarizing deceased Non-Party's public statements (pg. 6)</li> </ul>

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	<ul style="list-style-type: none"> <li>Unseal remainder of the document with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>153</b>	<ul style="list-style-type: none"> <li>Unseal in full (no applicable <i>Brown</i> minimal redactions or yet-to-be-noticed Non-Party names)</li> </ul>
<b>153-1</b>	<ul style="list-style-type: none"> <li>Unseal with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>164: Defendant's Motion to Compel all Attorney-Client Communications and Work Product Put At Issue by Plaintiff and Her Attorneys</b>	<ul style="list-style-type: none"> <li>Unseal in full (no applicable <i>Brown</i> minimal redactions or yet-to-be-noticed Non-Party names)</li> </ul>
<b>165</b>	<ul style="list-style-type: none"> <li>Unseal in full (no applicable <i>Brown</i> minimal redactions or yet-to-be-noticed Non-Party names)</li> </ul>
<b>165-3</b>	<ul style="list-style-type: none"> <li>Unseal in full (document is already public)</li> </ul>
<b>165-8</b>	<ul style="list-style-type: none"> <li>Unseal with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>165-10</b>	<ul style="list-style-type: none"> <li>Unseal with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>165-11</b>	<ul style="list-style-type: none"> <li>Unseal in full (no applicable <i>Brown</i> minimal redactions or yet-to-be-noticed Non-Party names)</li> </ul>
<b>184</b>	<ul style="list-style-type: none"> <li>Unseal portions mentioning Doe 1 or Doe 2 (pg. 3)</li> <li>Unseal with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>185</b>	<ul style="list-style-type: none"> <li>Unseal in full (no applicable <i>Brown</i> minimal redactions or yet-to-be-noticed Non-Party names)</li> </ul>
<b>185-2</b>	<ul style="list-style-type: none"> <li>Unseal in full (document is already public)</li> </ul>
<b>185-3</b>	<ul style="list-style-type: none"> <li>Unseal in full (document is already public)</li> </ul>
<b>185-11</b>	<ul style="list-style-type: none"> <li>Unseal pages released by Second Circuit (<i>see</i> List of Decided Motions)</li> <li>Unseal remainder of document with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>185-13</b>	<ul style="list-style-type: none"> <li>Unseal in full (no applicable <i>Brown</i> minimal redactions or yet-to-be-noticed Non-Party names)</li> </ul>

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<b>185-14</b>	<ul style="list-style-type: none"> <li>Unseal with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>185-15</b>	<ul style="list-style-type: none"> <li>Unseal in full (document is already public)</li> </ul>
<b>185-16</b>	<ul style="list-style-type: none"> <li>Unseal with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>194</b>	<ul style="list-style-type: none"> <li>Unseal in full (no applicable <i>Brown</i> minimal redactions or yet-to-be-noticed Non-Party names)</li> </ul>
<b>194-3</b>	<ul style="list-style-type: none"> <li>Unseal in full (no applicable <i>Brown</i> minimal redactions or yet-to-be-noticed Non-Party names)</li> </ul>
<b>172: Plaintiff's Motion to Exceed Presumptive Ten Deposition Limit</b>	<ul style="list-style-type: none"> <li>Unseal with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> <li>In the alternative, at a minimum, unseal bullets summarizing Maxwell's public deposition testimony</li> </ul>
<b>173</b>	<ul style="list-style-type: none"> <li>Unseal with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>173-5</b>	<ul style="list-style-type: none"> <li>Unseal pages released by Second Circuit (<i>see</i> List of Decided Motions)</li> <li>No position as to the remainder of the document</li> </ul>
<b>173-6</b>	<ul style="list-style-type: none"> <li>Unseal pages released by Second Circuit (<i>see</i> List of Decided Motions)</li> <li>Unseal portions mentioning Doe 1 or Doe 2 (pg. 71, 72, 73, 218)</li> <li>Unseal the remainder of the document with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>189</b>	<ul style="list-style-type: none"> <li>Unseal everything except for redaction on page 5 until Non-Party deponent receives notice</li> </ul>
<b>190</b>	<ul style="list-style-type: none"> <li>Unseal in full (no applicable <i>Brown</i> minimal redactions or yet-to-be-noticed Non-Party names)</li> </ul>
<b>190-1</b>	<ul style="list-style-type: none"> <li>Unseal everything except for inadvertently included letter on page 2</li> </ul>
<b>203</b>	<ul style="list-style-type: none"> <li>Unseal portions mentioning Doe 1 or Doe 2 (pp. 2, 5, 6)</li> <li>Unseal the remainder of the document with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>

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<b>204</b>	<ul style="list-style-type: none"> <li>• Unseal with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>204-1</b>	<ul style="list-style-type: none"> <li>• Unseal pages released by Second Circuit (<i>see</i> List of Decided Motions)</li> <li>• No position as to the remainder of the document</li> </ul>
<b>204-2</b>	<ul style="list-style-type: none"> <li>• Unseal pages released by Second Circuit (<i>see</i> List of Decided Motions)</li> <li>• No position as to the remainder of the document</li> </ul>
<b>204-3</b>	<ul style="list-style-type: none"> <li>• Unseal in full (no applicable <i>Brown</i> minimal redactions or yet-to-be-noticed Non-Party names)</li> </ul>
<b>211</b>	<ul style="list-style-type: none"> <li>• Unseal portions mentioning Doe 1 or Doe 2 (pp. 2, 5, 6)</li> <li>• Unseal the remainder of the document with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>212</b>	<ul style="list-style-type: none"> <li>• Unseal portions mentioning Doe 1 or Doe 2 (pg. 2)</li> <li>• Unseal the remainder of the document with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>212-1</b>	<ul style="list-style-type: none"> <li>• Unseal pages released by Second Circuit (<i>see</i> List of Decided Motions)</li> <li>• No position as to the remainder of the document</li> </ul>
<b>212-2</b>	<ul style="list-style-type: none"> <li>• Unseal pages released by Second Circuit (<i>see</i> List of Decided Motions)</li> <li>• No position as to the remainder of the document</li> </ul>
<b>212-3</b>	<ul style="list-style-type: none"> <li>• Unseal in full (no applicable <i>Brown</i> minimal redactions or yet-to-be-noticed Non-Party names)</li> </ul>
<b>224</b>	<ul style="list-style-type: none"> <li>• Unseal portions mentioning Doe 1 or Doe 2 (p. 2)</li> <li>• Unseal the remainder of the document with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>199: Plaintiff's Motion for Extension of Time to Complete Depositions</b>	<ul style="list-style-type: none"> <li>• N/A (not currently sealed or redacted)</li> </ul>
<b>228</b>	<ul style="list-style-type: none"> <li>• Unseal with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>229</b>	<ul style="list-style-type: none"> <li>• Unseal with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>

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<b>229-1</b>	<ul style="list-style-type: none"> <li>• No position</li> </ul>
<b>229-2</b>	<ul style="list-style-type: none"> <li>• Unseal pages released by Second Circuit (<i>see</i> List of Decided Motions)</li> <li>• Unseal the remainder of the document with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>229-4</b>	<ul style="list-style-type: none"> <li>• Unseal pages released by Second Circuit (<i>see</i> List of Decided Motions)</li> <li>• Unseal the remainder of the document with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>229-10</b>	<ul style="list-style-type: none"> <li>• Unseal in full (no applicable <i>Brown</i> minimal redactions or yet-to-be-noticed Non-Party names)</li> </ul>
<b>229-11</b>	<ul style="list-style-type: none"> <li>• Unseal in full (no applicable <i>Brown</i> minimal redactions or yet-to-be-noticed Non-Party names)</li> </ul>
<b>248</b>	<ul style="list-style-type: none"> <li>• No position</li> </ul>
<b>249</b>	<ul style="list-style-type: none"> <li>• Unseal in full (no applicable <i>Brown</i> minimal redactions or yet-to-be-noticed Non-Party names)</li> </ul>
<b>249-4</b>	<ul style="list-style-type: none"> <li>• Unseal portions mentioning Doe 1 or Doe 2 (pp. 4, 5)</li> <li>• Unseal the remainder of the document with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>249-13</b>	<ul style="list-style-type: none"> <li>• Unseal portions mentioning Doe 1 or Doe 2 (p. 2)</li> <li>• Unseal the remainder of the document with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>249-14</b>	<ul style="list-style-type: none"> <li>• Unseal with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>249-15</b>	<ul style="list-style-type: none"> <li>• Unseal with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>230: Defendant's Motion to Reopen Deposition of Plaintiff Virginia Giuffre</b>	<ul style="list-style-type: none"> <li>• Keep redactions of information related to Plaintiff's medical history</li> <li>• Unseal the remainder of the document with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>

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<b>235</b>	<ul style="list-style-type: none"> <li>• Unseal with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>235-4</b>	<ul style="list-style-type: none"> <li>• Unseal pages released by Second Circuit (<i>see</i> List of Decided Motions)</li> <li>• Unseal portions mentioning Doe 1 or Doe 2 (pp. 122, 126, 134, 138)</li> <li>• Unseal the remainder of the document with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>235-5</b>	<ul style="list-style-type: none"> <li>• Medical records on pages 5-12 should remain sealed</li> <li>• Unseal the remainder of the document with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>235-6</b>	<ul style="list-style-type: none"> <li>• Keep sealed</li> </ul>
<b>235-7</b>	<ul style="list-style-type: none"> <li>• No position</li> </ul>
<b>235-8</b>	<ul style="list-style-type: none"> <li>• Keep sealed</li> </ul>
<b>235-9</b>	<ul style="list-style-type: none"> <li>• Keep sealed</li> </ul>
<b>235-10</b>	<ul style="list-style-type: none"> <li>• Unseal with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>235-12</b>	<ul style="list-style-type: none"> <li>• Unseal with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>235-13</b>	<ul style="list-style-type: none"> <li>• Unseal with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>
<b>260</b>	<ul style="list-style-type: none"> <li>• Keep redactions</li> </ul>
<b>260-1</b>	<ul style="list-style-type: none"> <li>• Keep sealed</li> </ul>
<b>260-2</b>	<ul style="list-style-type: none"> <li>• Keep sealed</li> </ul>
<b>267</b>	<ul style="list-style-type: none"> <li>• Keep redactions of information related to Plaintiff's medical history</li> <li>• Unseal the remainder of the document with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li> </ul>

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<b>268</b>	<ul style="list-style-type: none"><li>• Unseal with applicable <i>Brown</i> minimal redactions (if any) and redactions of yet-to-be-noticed Non-Party names (if any)</li></ul>
<b>268-1</b>	<ul style="list-style-type: none"><li>• Keep sealed</li></ul>
<b>268-2</b>	<ul style="list-style-type: none"><li>• Unseal pages released by Second Circuit (<i>see</i> List of Decided Motions)</li><li>• No position on the remainder of the document</li></ul>