

EXHIBIT A

BOIES, SCHILLER & FLEXNER LLP

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June 30, 2016

VIA E-MAIL

Laura A. Menninger, Esq.
HADDON, MORGAN AND FOREMAN, P.C.
150 East 10th Avenue
Denver, Colorado 80203
lmenninger@hmflaw.com

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

Dear Laura,

I write pursuant to this Court's June 20, 2016, Order regarding search and production from Defendant's electronic media. Accordingly, please use IMAP Capable software (or a functional equivalent) to capture all of the sent/received emails from Ms. Maxwell's various email accounts, including but not limited to the following: [REDACTED] and any other accounts at [REDACTED] (and any other accounts at [REDACTED]); (3) any of Ms. Maxwell's email account associated with The Terramar Project (including any account [REDACTED]); and (4) any other email accounts either used in the past, or currently in use.

Additionally, please use FileSeek software (or a functional equivalent) to retrieve any data, including electronic documents (such as Word documents; PDFs; Excel sheets; etc.), from Ms. Maxwell's devices, including personal computers, work computers, any tablets, and any phones. This includes any cloud storage accounts. Please confirm that you have imaged Ms. Maxwell's hard drives and other devices.

Once you have gathered that data onto a platform (such as Summation or its functional equivalent), please run the below search terms. Since the Court ordered us to negotiate the search terms, please let me know if you think additional terms would be appropriate or whether you object to any terms, and your basis thereof.

When applying the search terms, the search terms need to "hit" on documents even if the terms are embedded within other words. So, for example, the term "acuity" would yield a hit on the document, even if the word in the document is "acuityreputatoin." To return a hit on those

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embedded terms, I request that you use “wildcards” to ensure that embedded terms are located. (Wildcard characters are used to expand word searches into pattern searches by “replacing” single or multiple characters.) Where there are a specific number of characters needed to be included, a single wildcard will achieve that purpose. For example, in some programs, ! is used for single character wildcards, and * is used for multiple character wildcards. For instance:

- (a) Single character wildcard example: a search for **L!n!** will return “long,” “link,” “lane,” “lone,” etc.
- (b) Multiple character wildcard example: a search for **chil*** will return “children,” “chill,” “chilling,” etc.
- (c) Mixed use of wildcards: a search for **L!n*** will return “lines,” “lining,” “linty,” etc.

Accordingly, the below search terms are submitted with wildcard characters to be applied in the manner of the examples above. Please apply them as such with whatever characters is required by the software/platform that you will be using.

Similarly, regarding how the terms are combined (**AND** or **OR**). **OR** should expand your results while **AND** will restrict result to only those which include all the terms.

Additionally, I want to clarify that I would like all of the metadata to be searched in addition to the text of the documents. For example, if the search term is “acuity,” “hits” should include all the document that include the word “acuity” in their text OR in their metadata (this includes words in items such as email subjects, filenames, as well as any documents which include that word somewhere within their text).

I also wanted to point out another special syntax with regard to proximity searching. This is a search that finds words within a specified distance from one another. On some software, this is represented as w/#, so a search for “**meet w/2 greet**” will return “meet and greet,” “greet and meet” and “meet and nicely greet.” Please apply accordingly.






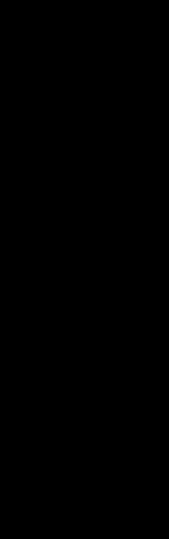

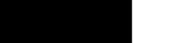
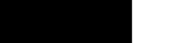





Additionally, for searches for people’s initials in the search terms, please use “exact matches,” “stand alone,” or “literal” terms (see, e.g., PA, AD, JE, GM).

Finally, the search terms are **not** to be treated as case-sensitive, meaning that the terms should be searched according to their letters, regardless of whether they are represented in the list as containing upper case or lower case letters.


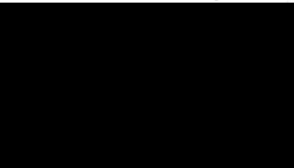
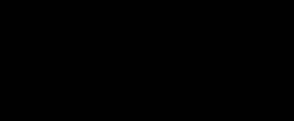
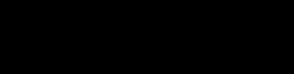
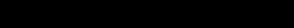


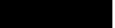

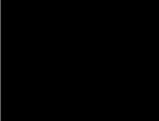
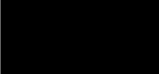
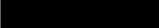
The following are the applicable search terms.

- 1) jef*
- 2) geof*





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- 3) epst!!n*
- 4) jeevacation*
- 5) j* w/2 *jep*
- 6) j* w/2 *jeep*
- 7) roberts*
- 8) g!!ff!!*
- 9) virginia*
- 10) jenna*
- 11) jena*
- 12) genna*
- 13) 
- 14) 
- 15) 
- 16) PA
- 17) JE
- 18) GM
- 19) AD
- 20) 
- 21) 
- 22) massage*
- 23) masseur*
- 24) therapist*
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- 41) 
- 42) *copter*
- 43) chopper*
- 44) pilot*
- 45) manifest*
- 46) log*
- 47) flight*
- 48) passport*
- 49) terramar*
- 50) southern* w/3 district*
- 51) palm* w/3 beach*
- 52) state* /3 attorney*
- 53) 
- 54) 
- 55) 
- 56) 
- 57) al!n*
- 58) all!n*
- 59) dersh*
- 60) 
- 61) alandersh*
- 62) 
- 63) 
- 64) new* w/3 mexico*
- 65) NM
- 66) virgin* w/3 island*
- 67) usvi*
- 68) little* w/3 st*
- 69) little* w/3 saint*
- 70) st* w/3 j*
- 71) saint* w/3 j*
- 72) lsj*
- 73) lagoon*
- 74) 
- 75) 
- 76) 
- 77) 
- 78) police*

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- 79) cop*
- 80) fbi*
- 81) federal* w/3 bur*
- 82) bur* w/8 inves! *
- 83) sex*
- 84) abuse*
- 85) toy*
- 86) dildo*
- 87) strap* w/3 on*
- 88) vibr*
- 89) sm* w/3 101*
- 90) slave*
- 91) erotic*
- 92) servitude*
- 93) 
- 94) 
- 95) high* w/3 school*
- 96) secondary* w/3 school*
- 97) campus*
- 98) 
- 99) 
- 100) licen!e*
- 101) assault*
- 102) juvenile*
- 103) seal*
- 104) joint* w/3 defen*
- 105) jda
- 106) roadhouse*
- 107) grill*
- 108) illegal*
- 109) immune*
- 110) prosecut*
- 111) law* w/3 enforc*
- 112) jane* w/3 *doe*
- 113) hospital*
- 114) hotel*
- 115) suite*
- 116) villa*

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- 117) model*
- 118) actress*
- 119) france*
- 120) paris*
- 121) zoro*
- 122) ranch*
- 123) vanity* w/ 3 fair*
- 124) [REDACTED]
- 125) [REDACTED]
- 126) [REDACTED]
- 127) [REDACTED]
- 128) [REDACTED]
- 129) [REDACTED]
- 130) [REDACTED]
- 131) [REDACTED]
- 132) [REDACTED]
- 133) [REDACTED]
- 134) [REDACTED]
- 135) [REDACTED]
- 136) [REDACTED]
- 137) [REDACTED]
- 138) [REDACTED]
- 139) [REDACTED]
- 140) [REDACTED]
- 141) [REDACTED]
- 142) [REDACTED]
- 143) paul*
- 144) cassell*
- 145) sharon*
- 146) churcher*
- 147) [REDACTED]
- 148) [REDACTED] *
- 149) [REDACTED] *
- 150) [REDACTED]
- 151) [REDACTED]
- 152) [REDACTED]
- 153) [REDACTED]
- 154) [REDACTED]

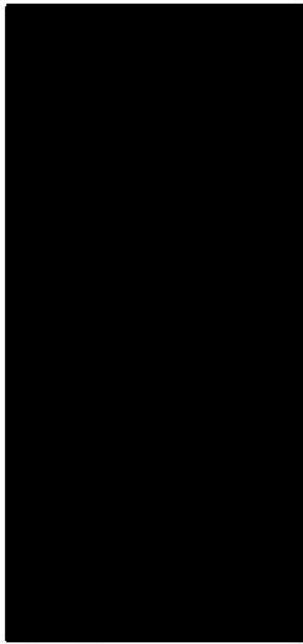
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208) stan*
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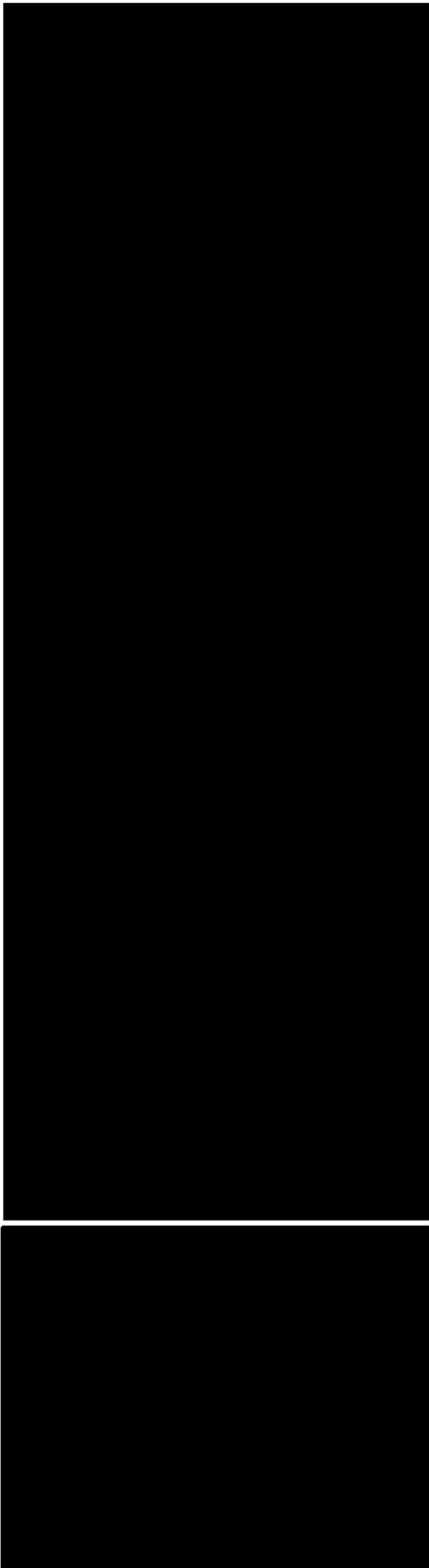


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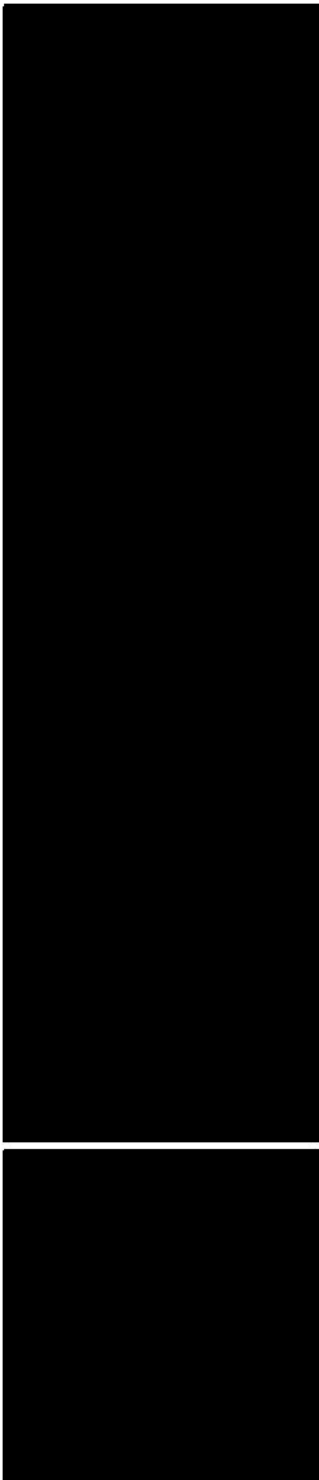
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342) underage*
343) underage*
344) minor*



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- 345) daily* w/10 mail*
- 346) daily* w/10 news*
- 347) lie*
- 348) obvious* w/10 lie*
- 349) sex w/3 toy*
- 350) nipple*
- 351) schoolgirl
- 352) school w/3 girl
- 353) us w/3 att*
- 354) United w/3 states w/3 att*
- 355) [REDACTED]
- 356) Pedophil*
- 357) Paedophil*
- 358) [REDACTED]
- 359) Traffic*
- 360) Bed*
- 361) Bath*
- 362) Masturbate*
- 363) Ejaculate*
- 364) Masseur*
- 365) Lingerie
- 366) Boies*
- 367) Mccawley*
- 368) Schultz*

Sincerely,



Meredith L. Schultz

MLS:dk