

EXHIBIT 4
(FILE UNDER SEAL)



Haddon, Morgan and Foreman, P.C.
Laura A. Menninger

150 East 10th Avenue
Denver, Colorado 80203
PH 303.831.7364 FX 303.832.2628
www.hmfllaw.com

October 17, 2016

VIA EMAIL

Meredith Schultz
Boies, Schiller & Flexner LLP
401 East Las Olas Blvd., Suite 1200
Fort Lauderdale, FL 33301
mschultz@bsfllp.com

Re: *Giuffre v. Maxwell*, 15-cv-07433-RWS - Plaintiff's Email Production

Dear Meredith:

The earliest-dated email communication Plaintiff produced was from October 19, 2010. Accordingly, there is an 11 year gap in your production (from 1999-2010). You have represented that you forensically searched the [REDACTED] and the [REDACTED] email accounts. You also represented that you have made forensic images of each of your client's computers and devices that she had access to from 1999-2015 and searched those for responsive documents. If this is all correct, logic dictates that Plaintiff used a different email account to communicate from 1999-2010. Plaintiff has not indicated what email account she used from 1999-2010. Therefore, I am writing to ask what email account Plaintiff used to communicate from 1999-2010. Please identify that account consistent with our Interrogatory Number 2.

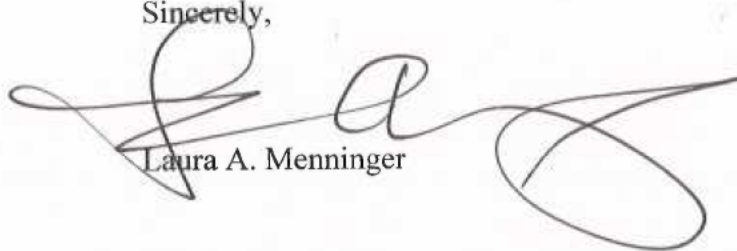
Secondly, I write to follow up on our correspondence of September 13 and 16 regarding Plaintiff's Hotmail account. I spoke to Yanna Rosenbloom (whom you incorrectly identify as Yanna Rosenberg) on June 10, 2016 and have my own phone records to prove it. During that call Ms. Rosenbloom informed me, as I informed you, that the Plaintiff's Hotmail account would have been deleted and made inactive had not been used in the prior 9 months; she thus confirmed to me that the account was not deleted and therefore had been used between October 10, 2015 (following the filing of the Complaint in this case) and June 10, 2016, the date I spoke with Ms. Rosenbloom. You are patently incorrect in telling me what my conversation with Ms. Rosenbloom entailed and you are also incorrect in your understanding of how that

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email account works. I presume you are trying to excuse your own neglect in obtaining clearly relevant documents that the Court has ordered you to produce.

Despite your promise on September 16 to "try again" with Microsoft, another month has gone by with neither a production of records from that account nor an explanation as to where you are in the process for obtaining those emails. Please either produce the emails by close of business tomorrow, October 18, or consider this a final written request for conferral.

Sincerely,



Laura A. Menninger