

COMPOSITE
EXHIBIT 14

(Filed Under Seal)

Sandra Perkins

From: Meredith Schultz
Sent: Thursday, June 16, 2016 4:56 PM
To: Laura Menninger (lmenninger@hmflaw.com)
Cc: Sigrid McCawley; Paul Cassell (cassellp@law.utah.edu); 'brad@pathtojustice.com' (brad@pathtojustice.com)
Subject: Proof of Service - Second Email
Attachments: Proof of Services

Laura,

I am writing to follow up on my June 13, 2016, letter and my June 14, 2016 email (attached), where I requested that you provide me with your proofs of service for the subpoenas you issued in this case. I requested that you provide them to me yesterday, but you have not done so. You made the same request of us and we provided our proofs of service to you earlier this week.

We are in the process of making travel arrangements for the depositions you noticed next week and scheduling around other matters and want to confirm that those witnesses have all been served with subpoenas and are attending the depositions set forth below:

Rebecca Boylan – Wednesday, June 22nd 9:00 a.m. – Fort Lauderdale 401 E. Las Olas at Gray Robinson’s office – suite 1000.

Michael Austrich – Thursday June 23rd 9:00 a.m. - Ocala Florida – Owens & Associates – 108 N. Magnolia Ave

Tony Figueroa – Friday June 24th – 9:00 a.m. - 1 Florida Park Drive, U.S. , Suite 214, Palm Coast Florida

Accordingly, kindly provide me – today – your proofs of service for all of the subpoenas you have issued in this case.

Thank you,

Meredith

Meredith L. Schultz
BOIES, SCHILLER & FLEXNER LLP
401 East Las Olas Blvd., Suite 1200
Fort Lauderdale, FL 33301
Phone: 954-356-0011 ext. 4204
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Sandra Perkins

From: Meredith Schultz
Sent: Tuesday, June 14, 2016 3:15 PM
To: Laura Menninger (lmenninger@hmflaw.com)
Cc: Sigrid McCawley; Sandra Perkins; Deborah Knowlton
Subject: Proof of Services
Attachments: PROOF OF SERVICES.PDF

Laura,

I'm following up on my June 14, 2016, letter, wherein, I agreed, as a courtesy, to provide you with proofs of service. They are attached. In the same letter, I requested that you do the same, and provide me with your proofs of service associated with the subpoenas you have issued in this case. Having made the request of me and having received a response, I am sure you will agree to do so. Please send them to me by tomorrow.

Thanks,

Meredith

Meredith L. Schultz
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Meredith L. Schultz, Esq.
Email: mschultz@bsfllp.com

June 13, 2016

Via CM/ECF

Laura A. Menninger, Esq.
Haddon, Morgan and Foreman, P.C.
150 East 10th Ave.
Denver, CO 80203

Re: ***Giuffre v. Maxwell***
Case no. 15-cv-07433-RWS – Regarding Certificates of Service

Dear Laura,

I have lawfully served the witnesses in this case, and have undertaken great effort to serve Ms. Marcinkova and Ms. Kellen. An affidavit from the process server engaged in that effort documenting such efforts was served upon you and filed with this Court. I'm familiar with Rule 45, and there is no requirement that certificates of service be served upon opposing counsel. Notice is all that is required under the Rules. You, yourself, have not served such certificates of service in this case. I completely reject your arbitrary statement that “[f]ailure to provide them . . . will be understood as an acknowledgement that you have not, in fact, undertaken the good faith efforts.” We have said we did. I acknowledge no such thing, and such a statement is nonsense.

In recognition of your request, I am in the process of gathering the certificates of service. I will serve them on you, merely as a courtesy, as I collect them. Please likewise provide all certificates of services for the witnesses you have noticed.

While we are on the topic of absences of responses, you did not respond to my June 8, 2016, letter requesting a meet and confer call. Therefore, I write again to schedule a meet-and-confer call regarding your grossly deficient production and improper objections in response to Plaintiff's Second Request for Production. I am available for a meet and confer call on this matter any time tomorrow and Wednesday, June 15, 2016, from 10:00 AM EST to 4:00 PM EST. Please advise, by tomorrow, what time such a call works for your schedule.

Thanks,



Meredith Schultz