

Exhibit A

From: [Sabina Mariella](#)
To: "[Laura Menninger](#)"; [Moskowitz, Bennet J.](#); [Sigrid McCawley](#)
Cc: [Jeff Pagliuca](#); [Andrew Villacastin](#); [DiRago, Molly](#); [Josh Schiller](#)
Subject: RE: A. Farmer joint status submission
Date: Tuesday, December 22, 2020 1:09:00 PM

Laura,

We need to confer on a timeline for dismissing this case and when you can expect to speak to your client about this very straightforward issue. A public filing in Ms. Maxwell's criminal case last week indicated that Ms. Maxwell has the ability to video conference with her attorneys for three hours per weekday and can otherwise communicate with her counsel for 13 hours per day, 7 days a week. We'd thus like to understand your purported inability to speak with her about this issue by any specific date.

Sabina

From: Laura Menninger [mailto:lmenninger@hmflaw.com]
Sent: Tuesday, December 22, 2020 10:59 AM
To: Sabina Mariella <smariella@bsflp.com>; Moskowitz, Bennet J. <Bennet.Moskowitz@troutman.com>; Sigrid McCawley <smccawley@bsflp.com>
Cc: Jeff Pagliuca <jpagliuca@hmflaw.com>; Andrew Villacastin <avillacastin@bsflp.com>; DiRago, Molly <Molly.DiRago@troutman.com>; Josh Schiller <jischiller@bsflp.com>
Subject: RE: A. Farmer joint status submission

CAUTION: External email. Please do not respond to or click on links/attachments unless you recognize the sender.

Sabina,

Let me rephrase my response: What is it that you think we can confer about before I have spoken to my client? Perhaps I am not understanding the topic for conferral.

As far as timeline, I can commit to get back to you as soon as I am able to discuss this with my client.

-Laura

Laura A. Menninger | Partner
Haddon, Morgan & Foreman, P.C.
150 E. 10th Avenue | Denver, CO 80203
+1 303 831 7364 (Office)
lmenninger@hmflaw.com

From: Sabina Mariella <smariella@bsflp.com>

Sent: Tuesday, December 22, 2020 7:07 AM

To: Laura Menninger <lmenninger@hmflaw.com>; Moskowitz, Bennet J.

<Bennet.Moskowitz@troutman.com>; Sigrid McCawley <smccawley@bsfllp.com>

Cc: Jeff Pagliuca <jpagliuca@hmflaw.com>; Andrew Villacastin <avillacastin@bsfllp.com>; DiRago, Molly <Molly.DiRago@troutman.com>; Josh Schiller <jischiller@bsfllp.com>

Subject: RE: A. Farmer joint status submission

Laura,

You've now ignored our requests for some sort of a timeline in three separate emails, and are now refusing to meet and confer with us. As you know, your delay is prejudicial to our client, and it appears that you will only take action if explicitly ordered to do so. If, by end of day today, you do not commit to when you can let us know whether your client agrees to a dismissal of this action on the terms the Court outlined, we will request another conference.

Sabina

From: Laura Menninger [<mailto:lmenninger@hmflaw.com>]

Sent: Monday, December 21, 2020 7:28 PM

To: Sabina Mariella <smariella@bsfllp.com>; Moskowitz, Bennet J.

<Bennet.Moskowitz@troutman.com>; Sigrid McCawley <smccawley@bsfllp.com>

Cc: Jeff Pagliuca <jpagliuca@hmflaw.com>; Andrew Villacastin <avillacastin@bsfllp.com>; DiRago, Molly <Molly.DiRago@troutman.com>; Josh Schiller <jischiller@bsfllp.com>

Subject: RE: A. Farmer joint status submission

CAUTION: External email. Please do not respond to or click on links/attachments unless you recognize the sender.

Your information is incorrect: I do not have the ability to speak to my client daily.

I don't think another meet and confer is necessary; I need to confer with my client, not counsel. As I said, I will let you know as soon as I am able to speak with my client.

-Laura

Laura A. Menninger | Partner

Haddon, Morgan & Foreman, P.C.

150 E. 10th Avenue | Denver, CO 80203

+1 303 831 7364 (Office)

lmenninger@hmflaw.com

From: Sabina Mariella <smariella@bsfllp.com>

Sent: Monday, December 21, 2020 2:15 PM

To: Laura Menninger <lmenninger@hmflaw.com>; Moskowitz, Bennet J.

<Bennet.Moskowitz@troutman.com>; Sigrid McCawley <smccawley@bsfllp.com>

Cc: Jeff Pagliuca <jpagliuca@hmflaw.com>; Andrew Villacastin <avillacastin@bsflp.com>; DiRago, Molly <Molly.DiRago@troutman.com>; Josh Schiller <jischiller@bsflp.com>

Subject: RE: A. Farmer joint status submission

Laura,

We cannot accept your refusal to commit to a timeframe for responding to a request the Court outlined to you last Wednesday. We understand that you have the ability to speak to your client daily, but if that is not the case you can explain that to Judge Freeman, who may be able to grant you time to speak to Ms. Maxwell about this issue.

Please let us know of your availability for a meet and confer tomorrow or Wednesday so that we may either reach agreement and file a stipulation of dismissal, or request another conference with the Court.

Sabina

From: Laura Menninger [<mailto:lmessenger@hmflaw.com>]

Sent: Monday, December 21, 2020 2:42 PM

To: Sabina Mariella <smariella@bsflp.com>; Moskowitz, Bennet J. <Bennet.Moskowitz@troutman.com>; Sigrid McCawley <smccawley@bsflp.com>

Cc: Jeff Pagliuca <jpagliuca@hmflaw.com>; Andrew Villacastin <avillacastin@bsflp.com>; DiRago, Molly <Molly.DiRago@troutman.com>; Josh Schiller <jischiller@bsflp.com>

Subject: RE: A. Farmer joint status submission

CAUTION: External email. Please do not respond to or click on links/attachments unless you recognize the sender.

Sabina –

Actually, the delay was occasioned by your refusal to provide a copy of the executed release to Ms. Maxwell, something the court ordered over your objection last Wednesday.

Ms. Maxwell has had other pressing court deadlines since the joint status conference last Wednesday, as you are well aware.

I do not control when I get to speak to my client and therefore will not be making any representation to you about when I “intend” to speak to her.

-Laura

Laura A. Menninger | Partner
Haddon, Morgan & Foreman, P.C.

150 E. 10th Avenue | Denver, CO 80203
+1 303 831 7364 (Office)
lmenninger@hmflaw.com

From: Sabina Mariella <smariella@bsflfp.com>
Sent: Monday, December 21, 2020 11:29 AM
To: Laura Menninger <lmenninger@hmflaw.com>; Moskowitz, Bennet J. <Bennet.Moskowitz@troutman.com>; Sigrid McCawley <smccawley@bsflfp.com>
Cc: Jeff Pagliuca <jpagliuca@hmflaw.com>; Andrew Villacastin <avillacastin@bsflfp.com>; DiRago, Molly <Molly.DiRago@troutman.com>; Josh Schiller <jischiller@bsflfp.com>
Subject: RE: A. Farmer joint status submission

Laura,

Yes, your client has now inexplicably delayed the resolution of this lawsuit for two months. We are all aware that she is incarcerated, but after Judge Freeman's clear statement that she will not order Ms. Farmer to disclose the amount of her compensation to you, and after your statement in open court that your only issue with receiving a redacted copy of the general release is its authenticity, it is entirely unclear what is left to discuss with your client or why it should have taken 5 days to have such a discussion. Judge Freeman said she would make herself available if we cannot resolve this expeditiously, and we intend to take her up on that.

Please state clearly whether you intend to speak to your client by end of day tomorrow, and provide your availability for a call with the Court on Wednesday.

Sabina

From: Laura Menninger [<mailto:lmenninger@hmflaw.com>]
Sent: Monday, December 21, 2020 12:15 PM
To: Sabina Mariella <smariella@bsflfp.com>; Moskowitz, Bennet J. <Bennet.Moskowitz@troutman.com>; Sigrid McCawley <smccawley@bsflfp.com>
Cc: Jeff Pagliuca <jpagliuca@hmflaw.com>; Andrew Villacastin <avillacastin@bsflfp.com>; DiRago, Molly <Molly.DiRago@troutman.com>; Josh Schiller <jischiller@bsflfp.com>
Subject: RE: A. Farmer joint status submission

CAUTION: External email. Please do not respond to or click on links/attachments unless you recognize the sender.

Sabina –

I will be able to get back to you as soon as I am able to discuss it with my client. That likely will not be today. Your client has been vocal in asking that Ms. Maxwell be kept in custody, which of course makes it more difficult for her to communicate with her attorneys.

Is there some basis for the 5 p.m. deadline or the threat to “call the court” in the next two days?

-Laura

Laura A. Menninger | Partner
Haddon, Morgan & Foreman, P.C.
150 E. 10th Avenue | Denver, CO 80203
+1 303 831 7364 (Office)
lmenninger@hmflaw.com

From: Sabina Mariella <smariella@bsfllp.com>
Sent: Monday, December 21, 2020 10:11 AM
To: Laura Menninger <lmenninger@hmflaw.com>; Moskowitz, Bennet J. <Bennet.Moskowitz@troutman.com>; Sigrid McCawley <smccawley@bsfllp.com>
Cc: Jeff Pagliuca <jpagliuca@hmflaw.com>; Andrew Villacastin <avillacastin@bsfllp.com>; DiRago, Molly <Molly.DiRago@troutman.com>; Josh Schiller <jischiller@bsfllp.com>
Subject: RE: A. Farmer joint status submission

Laura,

Please let us know by 5pm EST whether receipt of the letter described below will cause you to stipulate to dismissal of this case with prejudice. Otherwise, we intend to call the Court on Tuesday or Wednesday. Bennet and Laura, please let us know your availability for such a call, although Plaintiff hopes that one will not be necessary.

Sabina

From: Sabina Mariella
Sent: Thursday, December 17, 2020 5:41 PM
To: 'Laura Menninger' <lmenninger@hmflaw.com>; Moskowitz, Bennet J. <Bennet.Moskowitz@troutman.com>; Sigrid McCawley <Smccawley@BSFLLP.com>
Cc: Jeff Pagliuca <jpagliuca@hmflaw.com>; Andrew Villacastin <AVillacastin@BSFLLP.com>; DiRago, Molly <Molly.DiRago@troutman.com>; Josh Schiller <JiSchiller@BSFLLP.com>
Subject: RE: A. Farmer joint status submission

Laura,

Pursuant to Judge Freeman’s directions during the telephone conference yesterday, we propose providing you with a letter signed by counsel for Plaintiff and the Estate stating the following, and attaching the redacted, executed copy of the General Release:

“In accordance with Judge Freeman’s instructions at the status conference held in the above-referenced matter on December 16, 2020, we are attaching to this letter an authentic copy of the General Release that Annie Farmer executed on October 3, 2020, in connection with her

participation in the Epstein Victims' Compensation Program. We agree that we will not dispute the authenticity of this document in any future proceeding."

Please let us know if you will sign the attached stipulation after receiving such a letter, plus the redacted, executed copy of the General Release.

Sabina
