

From: David Boies [mailto:xboies@gmail.com]
Sent: Tuesday, October 2, 2018 10:29 PM
To: Miller, Michael
Cc: Laura Menninger; Sigrid McCawley; Chu, Justin; Scott Link (scott@linkrocklaw.com); Stan Pottinger; Meredith Schultz; Paul Cassell (cassellp@law.utah.edu); brad@epllc.com; Jeff Pagliuca
Subject: Re: Defendant Maxwell's Deposition

Not necessarily. We are trying to accommodate Ms. Maxwell's counsel. My understanding is that we can do so if Ms. Ransome's deposition is moved to November 8. I had expected that all Defendants' counsel were coordinating. If November 8 works for your deposition of the Plaintiff, and if November 7 still works for the deposition of Ms. Maxwell, I think we are done. If not, then I expect we will try to rearrange things again to try to depose the Plaintiff on November 5 and go to the Court with respect to Ms. Maxwell.

Sent from my iPad

On Oct 3, 2018, at 1:38 AM, Miller, Michael <mmiller@steptoe.com> wrote:

Dear all. We are confirmed for Ms. Ransome's deposition on the 5th. Mike

Sent from my iPhone

On Oct 2, 2018, at 6:35 PM, Laura Menninger <lmenninger@hmflaw.com> wrote:

Hello Sigrid

I have asked since August to have a phone conferral to schedule all the depositions. I did not receive a response. I also emailed you two available dates on September 4, to which I received no response. I understand that you had multiple conferrals with the other defendants' counsel regarding deposition dates without including me. On our phone conferral yesterday, you were not sure which dates your side could do, thus limiting the usefulness of the call.

In any event, I can accept a November 8 deposition date for Ghislaine in NY. I am available on either Nov 5 or 7 for Ms. Ransome's in NY.

Thank you,
-Laura

On Oct 2, 2018, at 1:23 PM, Sigrid McCawley <smccawley@bsfillp.com> wrote:

Hello Laura,

As you know, we have been seeking Defendant Maxwell's deposition since August and have provided multiple date options in an effort to accommodate you and your client. Based on our meet and confer call yesterday, you indicated that a deposition on November 7th or 8th in New York may be an option for Maxwell given that the parties will be in New York for the mediation on November 9th. Accordingly, we propose that Ms. Ransome's deposition take place on November 7th and Defendant Maxwell's deposition take place on November 8th both in New York. If you and your co-counsel do not agree with these dates then we will depose Defendant Maxwell on October 25th and will go to the Court to determine whether Defendant Maxwell's deposition must be held in the US or London on that date.

Kindly let me know by close of business today.

Thank you,
Sigrid