

Exhibit A
Plaintiff's Position on Docket Entries 231, 279, 315, 320, & 335

Docket Entry¹	Plaintiff's Position
231: Defendant's Motion for Rule 37(b) & (c) for Failure to Comply with Court Order and Sanctions for Failure to Comply with Rule 26(a)	Unseal and redact only (1) medical information and (2) names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
232	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
232-7	Unseal and redact only (1) medical information and (2) names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The full version of this deposition transcript was unsealed by this Court on July 30, 2020, DE 1090-32. If this excerpt of the transcript is unsealed, it should be redacted in the same way as DE 1090-32, but the redactions of the names of Non-Parties whose time to object has expired should be removed.
232-8	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The Original Parties sent the Non-Party deponent (Doe 131) notice of unsealing, and the Non-Party deponent did not request excerpts.
232-9	Keep sealed (medical records).
232-10	Keep sealed (medical records).
232-11	Unseal. Note: Original Parties agree.
257	Unseal and redact only (1) medical information and (2) names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.

¹ Plaintiff has omitted documents that are not currently sealed or redacted from this chart

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258	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
258-1	Keep sealed until Non-Party deponent (Doe 151) time to object expires. Note: Original Parties agree to keep sealed, but for different reasons.
258-2	Keep sealed until Non-Party deponent (Doe 160) time to object expires. Note: Original Parties agree to keep sealed, but for different reasons.
258-3	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The Original Parties sent the Non-Party deponent (Doe 83) notice of unsealing, and the Non-Party deponent did not request excerpts.
258-4	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The deponent is not on the Non-Party notification list because he is a law enforcement officer.
258-5	Unseal but redact medical information and addresses.
258-6	Unseal but redact medical information and addresses.
258-7	Unseal but redact tax returns and addresses.
258-8	Keep sealed (medical records).
258-9	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The Original Parties sent the Non-Party deponent (Doe 67) notice of unsealing, and the Non-Party deponent did not request excerpts.

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258-10	Unseal but redact medical information.
261	Unseal and redact only (1) medical information and (2) names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
269	Unseal but redact medical information.
270	Unseal. Note: Original Parties agree.
270-1	Keep sealed (medical records).
270-2	Unseal and redact only (1) medical information and (2) names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The full version of this deposition transcript was unsealed by this Court on July 30, 2020, DE 1090-32. If this excerpt of the transcript is unsealed, it should be redacted in the same way as DE 1090-32, but the redactions of the names of Non-Parties whose time to object has expired should be removed.
270-3	Unseal but redact address.
270-4	Unseal. Note: Original Parties agree.
270-6	Unseal. Note: Original Parties agree.
272	Unseal. Note: Original Parties agree.

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272-1	Unseal and redact only (1) medical information and (2) names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
272-2	Unseal. Note: Original Parties agree.
272-3	Keep sealed (medical records).
272-4	Unseal but redact medical information.
272-5	Already publicly filed (DE 45).
272-6	Already publicly filed (DE 31).
272-7	Unseal but redact (1) information about Plaintiff when a minor and (2) medical information.
272-8	Keep sealed (medical records)
272-9	Unseal. Note: Original Parties agree.
272-10	Unseal and redact only (1) medical information and (2) names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The full version of this deposition transcript was unsealed by this Court on July 30, 2020, DE 1090-32. If this excerpt of the transcript is unsealed, it should be redacted in the same way as DE 1090-32, but the redactions of the names of Non-Parties whose time to object has expired should be removed.
303	Unseal but redact medical information.

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304	Unseal. Note: Original Parties agree.
304-1	Unseal but redact medical information.
304-2	Keep sealed (medical records).
304-3	Keep sealed (medical records).
304-4	Unseal but redact medical information.
313-1	Unseal but redact medical information.
279: Plaintiff's Motion for Adverse Inference Instruction	Unseal in full.
280	Unseal in full.
280-1	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
280-2	Unseal subject to Second Circuit redactions. Note: This document was released by the Second Circuit with redactions. The redactions should match the Second Circuit redactions.
288-1	Unseal in full.

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288-2	Unseal in full.
290	Unseal in full.
291-1	Unseal in full.
291-2	Unseal in full.
291-3	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
338	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
338-1	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
338-2	Unseal in full.
338-3	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
338-4	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
338-5	Unseal in full. Note: These pages of this deposition transcript were released by the Second Circuit without redactions.
338-6	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.

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	Note: The deponent is not on the Non-Party notification list because he is a law enforcement officer.
338-7	Keep sealed until Non-Party deponent (Doe 160) time to object expires. Note: Original Parties agree to keep sealed, but for different reasons.
338-8	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
338-9	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The Original Parties sent the Non-Party deponent (Doe 7) notice of unsealing, and the Non-Party deponent did not request excerpts.
338-10	Unseal. Note: Original Parties agree.
353	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
315: Plaintiff's Motion to Enforce Court Order and Direct Defendant to Answer Deposition Questions	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
316	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
316-1	Keep sealed until Non-Party deponent (Doe 160) time to object expires. Note: Original Parties agree to keep sealed, but for different reasons.
316-2	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.

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	<p>Note: The Original Parties sent the Non-Party deponent (Doe 67) notice of unsealing, and the Non-Party deponent did not request excerpts.</p>
316-3	<p>Unseal in full.</p> <p>Note: These pages of this deposition transcript were released by the Second Circuit without redactions.</p>
316-4	<p>Unseal in full.</p> <p>Note: These pages of this deposition transcript were released by the Second Circuit without redactions.</p>
316-5	<p>Unseal in full.</p> <p>Note: These pages of this deposition transcript were released by the Second Circuit without redactions.</p>
316-6	<p>Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.</p>
316-7	<p>Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.</p>
316-8	<p>Unseal and redact only (1) names and identifying information of minors and (2) names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.</p> <p>Note: Portions of this document were redacted and released by the Second Circuit. The redactions of the portions already released should match the Second Circuit redactions.</p>
339	<p>Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.</p>
340	<p>Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.</p>

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340-1	<p>Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.</p> <p>Note: The full version of this deposition transcript was unsealed by this Court on July 30, 2020, DE 1090-32. If this excerpt of the transcript is unsealed, it should be redacted in the same way as DE 1090-32, but the redactions of the names of Non-Parties whose time to object has expired should be removed.</p>
340-3	<p>Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.</p>
340-4	<p>Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.</p>
340-5	<p>Keep sealed until Non-Party deponent (Doe 160) time to object expires.</p> <p>Note: Original Parties agree to keep sealed, but for different reasons.</p>
340-6	<p>Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.</p> <p>Note: The deponent is not on the Non-Party notification list because he is a law enforcement officer.</p>
340-7	<p>Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.</p> <p>Note: The Original Parties sent the Non-Party deponent (Doe 1) notice of unsealing, the Non-Party deponent requested excerpts, and the Non-Party deponent did not object to unsealing within two weeks of receiving the excerpts.</p>
340-8	<p>Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.</p>

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	<p>Note: The Original Parties sent the Non-Party deponent (Doe 67) notice of unsealing, and the Non-Party deponent did not request excerpts.</p>
340-9	<p>Keep sealed until Non-Party deponent (Doe 151) time to object expires.</p> <p>Note: Original Parties agree to keep sealed, but for different reasons.</p>
368	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
369	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
369-1	<p>Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.</p> <p>Note: This deposition transcript was unsealed on October 22, 2020, DE 1137-13. This document should be redacted in the same way as DE 1137-13, but the redactions of the names of Non-Parties whose time to object has expired should be removed.</p>
369-2	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
369-3	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
369-4	<p>Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.</p> <p>Note: The Original Parties sent the Non-Party deponent (Doe 67) notice of unsealing, and the Non-Party deponent did not request excerpts.</p>

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369-5	<p>Keep sealed until Non-Party deponent (Doe 160) time to object expires.</p> <p>Note: Original Parties agree to keep sealed, but for different reasons.</p>
369-6	<p>Unseal subject to Second Circuit redactions.</p> <p>Note: These pages of this deposition transcript were released by the Second Circuit without redactions, except for page 59 which contains redactions of a minor's name.</p>
369-7	<p>Unseal in full.</p> <p>Note: These pages of this deposition transcript were released by the Second Circuit without redactions.</p>
369-8	<p>Unseal in full.</p> <p>Note: These pages of this deposition transcript were released by the Second Circuit without redactions.</p>
369-9	<p>Unseal in full.</p> <p>Note: This document was released by the Second Circuit without redactions.</p>
369-10	<p>Unseal in full.</p>
369-11	<p>Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.</p> <p>Note: The deponent is not on the Non-Party notification list because he is a law enforcement officer.</p>
369-12	<p>Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.</p> <p>Note: The Original Parties sent the Non-Party deponent (Doe 145) notice of unsealing, and the Non-Party deponent did not request excerpts.</p>
369-13	<p>Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.</p>

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	Note: The Original Parties sent the Non-Party deponent (Doe 155) notice of unsealing, and the Non-Party deponent did not request excerpts.
369-14	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The Original Parties sent the Non-Party deponent (Doe 99) notice of unsealing, and the Non-Party deponent did not request excerpts.
369-15	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: The Original Parties sent the Non-Party deponent (Doe 122) notice of unsealing, and the Non-Party deponent did not request excerpts.
369-16	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired. Note: Non-Party deponent is deceased.
320: Defendant's Submission Regarding "Search Terms" And Notice Of Compliance With Court Order Concerning Forensic Examination Of Devices	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
321	Retain redaction of email address.
321-1	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
321-2	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.

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321-3	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
321-4	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
321-5	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
321-6	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
323	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
335: Plaintiff's Motion for Protective Order for Court to Direct Defendant to Disclose Individuals Whom Defendant Disseminated Confidential Information	Unseal but redact information about events when Plaintiff was minor child.
336	Unseal. Note: Original Parties agree.
336-1	Unseal. Note: Original Parties agree.
336-2	Unseal but redact information about events when Plaintiff was minor child.
336-3	Unseal. Note: Original Parties agree.
380	Unseal but redact information about events when Plaintiff was minor child.

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381	Unseal. Note: Original Parties agree.
381-1	Keep sealed (information about events when Plaintiff was minor child).
381-2	Keep sealed (information about events when Plaintiff was minor child).
381-3	Keep sealed (information about events when Plaintiff was minor child).
381-4	Unseal redacted version released by Second Circuit. Note: Original Parties agree.
381-5	Unseal redacted version released by Second Circuit. Note: Original Parties agree.
381-6	Unseal but redact telephone numbers, email addresses, and addresses.
381-7	Unseal redacted version released by Second Circuit. Note: Original Parties agree.
381-8	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
392	Unseal but redact information about events when Plaintiff was minor child.
393	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.

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393-1	<p>Unseal subject to Second Circuit redactions.</p> <p>Note: These pages of these deposition transcripts were all released by the Second Circuit without redactions, except for page 24 of the composite exhibit, where the Second Circuit redacted a minor's name.</p>
393-2	<p>Unseal in full.</p> <p>Note: This document was released by the Second Circuit without redactions.</p>
393-3	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
393-4	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
400	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
401	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
401-1	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
401-2	Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.
401-3	<p>Unseal in full.</p> <p>Note: These pages of this deposition transcript were released by the Second Circuit without redactions.</p>
401-4	<p>Keep sealed until Non-Party deponent (Doe 160) time to object expires</p> <p>Note: Original Parties agree to keep sealed, but for different reasons.</p>

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401-5	<p>Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.</p> <p>Note: The Original Parties sent the Non-Party deponent (Doe 1) notice of unsealing, the Non-Party deponent requested excerpts, and the Non-Party deponent did not object to unsealing within two weeks of receiving the excerpts.</p>
401-6	<p>Unseal and redact only names and identifying information of Non-Parties who have objected to unsealing or whose time to object to unsealing has not yet expired.</p> <p>Note: The Original Parties sent the Non-Party deponent (Doe 67) notice of unsealing, and the Non-Party deponent did not request excerpts.</p>