

EXHIBIT X



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July 14, 2016

VIA EMAIL

Meredith Schultz
Boies, Schiller & Flexner LLP
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Re: *Giuffre v. Maxwell*, Case No. 15-cv-07433-RWS

Meredith:

I write, once again, regarding Plaintiff's extensive concealed medical records. I note in your impermissibly filed Sur-Reply, you already are seeking records pertaining to

[REDACTED] However, numerous other responsive records exist that have not yet been produced and which you could easily have accessed at any point during this discovery period.

Contained within records you recently produced are references to Plaintiff's enrollment in Medicare through the Australian Government Health Insurance Commission, with Medicare Numbers:

[REDACTED]

According to the Australian Department of Human Service's website,¹ Plaintiff can access, view, and request information concerning her healthcare history in Australia, including the names of her healthcare providers and her treatment dates. Additional online information about her healthcare can be found at My Health Record,² also maintained by the Australian Department of Human Services.

¹ <https://www.humanservices.gov.au/customer/services/medicare/healthcare-identifiers-service>

² <https://myhealthrecord.gov.au/internet/mhr/publishing.nsf/Content/find-out>

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Furthermore, it appears that Plaintiff is enrolled in Australia's "Pharmaceutical Benefits Scheme" or "PBS." See <http://www.pbs.gov.au/info/general/fag>; [REDACTED] Plaintiff's prescription history therefore is also readily accessible.³

Given that you have had this information all along, the protestations that you have been unable to timely identify Plaintiff's treatment providers or produce records is demonstrably inaccurate. In light of your representations to the Court regarding the allegedly diligent efforts to identify all health care providers and provide documents compelled by the Court, please provide us with a printout of all information available through utilization of these resources showing the information Plaintiff has had access to all along through these forums.

I presume that armed with your client's Medicare number, and her PBS enrollment, you will now undertake a complete Australian medical and pharmaceutical record search,⁴ disclose all of her healthcare providers, and seek and produce their records as well as her pharmaceutical records, including but not limited to:

- [REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED]
- Dr. John Bowen, to whom Plaintiff was referred by Dr. Sellathuri on November 6, 2008 (GIUFFRE 5089)
- Her "own psychiatrist" to whom she stated an intent to visit on October 31, 2003 (GIUFFRE 3241)

■ [REDACTED]

[REDACTED]
[REDACTED]. Both of those pharmacies likewise have release forms for their records. [REDACTED]
[REDACTED]. If you need assistance locating those release forms, please let me know.

Also please consider this a written conferral. If you do not intend to gather and

³ <https://www.humanservices.gov.au/sites/default/files/ms040-1607en.pdf>

⁴ Defendant's Request for Production of Documents No. 26 sought: "All Documents concerning any prescription drugs taken by You, including the prescribing doctor, the dates of said prescription, and the dates of any fulfillment of any such prescription."

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produce these documents, please let me know a time we can have the oral conferrals required by the Court prior to Monday close of business, at which time you can share with me the bases for such refusal.

Sincerely,

HADDON, MORGAN AND FOREMAN, P.C.

/s/ Laura A. Menninger

Laura A. Menninger