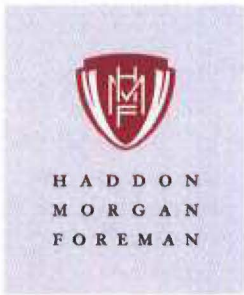


Exhibit 1



Haddon, Morgan and Foreman, P.C.
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May 18, 2016

VIA EMAIL

Meredith Schultz, Esq.
Boies, Schiller & Flexner LLP
401 E. Las Olas Boulevard, Ste. 1200
Ft. Lauderdale, FL 33301
mschultz@bsflp.com

Re: *Giuffre v. Maxwell*

Dear Ms. Schultz:

Pursuant to paragraph 11 of the Protective Order in this case Ms. Maxwell disputes the confidential designation of documents produced by Ms. Maxwell to the Plaintiff, GM 748-849. Your email does not provide any good faith basis for the assertion, likely because there is none. GM 748-840 are various police reports that have been publicly available for years. GM 841-849 are public comments about your client's story which are available to the world by a simple Google search.

This designation, done without any good faith basis, is another disappointing example of the lack of professionalism demonstrated by Plaintiff in this case. Please withdraw it immediately.

Very truly yours,

A handwritten signature in blue ink, appearing to be 'JP', written over the typed name Jeffrey S. Pagliuca.

Jeffrey S. Pagliuca

JSP/BR