

EXHIBIT 4

(Filed Under Seal)

Sigrid McCawley

From: Sigrid McCawley
Sent: Tuesday, May 17, 2016 3:53 PM
To: Laura Menninger; Meredith Schultz; Jeff Pagliuca
Cc: 'brad@pathtojustice.com' (brad@pathtojustice.com); Paul Cassell (cassellp@law.utah.edu)
Subject: RE: Notice of Subpoena
Attachments: May-June 2016 Deposition Calendar.pdf

Hello Laura – We are working on the calendar and I have it almost complete but I was awaiting confirmation on a date from Mr. Rizzo's counsel so I didn't want to send it out prematurely and that was delaying me.

We were serving subpoenas on dates that we thought are grouped within the locations/date ranges we discussed during the meet and confer and since we have been having an extraordinarily difficult time serving witnesses who appear to be attempting to evade service we need to keep that process moving.

We do intend to work with you on dates as we discussed. Attached is the proposed calendar with the caveat that dates may shift if witnesses make change requests but we are doing our best to group locations together where possible.

Again – this is not final as I noted I believe you had some dates you were gone but were checking with Jeff to determine his availability.

Finally, we are writing to confer whether you will stipulate that we may exceed the 10 deposition limit to complete discovery in this case or whether we need to file a motion with the Court on that issue.

Thank you,
Sigrid

Sigrid S. McCawley
Partner

BOIES, SCHILLER & FLEXNER LLP

401 East Las Olas Blvd., Suite 1200

Fort Lauderdale, FL 33301

Phone: 954-356-0011 ext. 4223

Fax: 954-356-0022

<http://www.bsflp.com>

From: Laura Menninger [mailto:lmenninger@hmflaw.com]
Sent: Tuesday, May 17, 2016 3:19 PM
To: Meredith Schultz; Jeff Pagliuca
Cc: Sigrid McCawley; 'brad@pathtojustice.com' (brad@pathtojustice.com); Paul Cassell (cassellp@law.utah.edu)
Subject: Re: Notice of Subpoena

Sigrid and Brad -

We had a conferral last week in which you promised to provide for conferral purposes a proposed schedule for depositions we both had requested in various locations. Rather than provide any such schedule, you have instead sent us notices for approximately 7 depositions in NY and Florida, one for an individual who you did not mention deposing and who does not appear among the extensive list of witnesses in your Rule 26 disclosures.

If you do not intend to abide by the representations you made in our conferral, then please advise and we will once again be forced to seek intervention of the Court. See Local Rule 26.4.

-Laura

From: Meredith Schultz <mschultz@BSFLLP.com>

Date: Tuesday, May 17, 2016 at 1:08 PM

To: Laura Menninger <lmenninger@hmflaw.com>, Jeff Pagliuca <jpagliuca@hmflaw.com>

Cc: Sigrid McCawley <smccawley@bsfllp.com>, Brad Edwards <brad@pathtojustice.com>, Paul Cassell <cassellp@law.utah.edu>

Subject: Notice of Subpoena

Laura,

Please see the attached documents.

Thanks,

Meredith

Meredith L. Schultz
BOIES, SCHILLER & FLEXNER LLP
401 East Las Olas Blvd., Suite 1200
Fort Lauderdale, FL 33301
Phone: 954-356-0011 ext. 4204
Fax: 954-356-0022
<http://www.bsfllp.com>

The information contained in this electronic message is confidential information intended only for the use of the named recipient(s) and may contain information that, among other protections, is the subject of attorney-client privilege, attorney work product or exempt from disclosure under applicable law. If the reader of this electronic message is not the named recipient, or the employee or agent responsible to deliver it to the named recipient, you are hereby notified that any dissemination, distribution, copying or other use of this communication is strictly prohibited and no privilege is waived. If you have received this communication in error, please immediately notify the sender by replying to this electronic message and then deleting this electronic message from your computer. [v.1]

Virginia Giuffre v. Ghislaine Maxwell

Case no. 15-cv-07433-RWS

MAY 2016

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18 Deposition of [REDACTED] Ft. Lauderdale, FL (confirmed)	19	20 Deposition of [REDACTED] [REDACTED] Oxford, FL (confirmed)	21
22	23	24 Deposition of [REDACTED] Denver, CO (confirmed although location may change per Menninger)	25	26 Deposition of Dr. Steven Olson Denver, CO (confirmed)	27	28
29	30	31 Deposition of Juan Alessi Ft. Lauderdale, FL (subpoena served)				

Virginia Giuffre v. Ghislaine Maxwell
Case no. 15-cv-07433-RWS

June 2016

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
			1 Deposition of Maria Alessi Ft. Lauderdale, FL (subpoena served) and/or [REDACTED]	2 Deposition of [REDACTED] Ocala, FL (subpoena served but Maxwell's counsel needs to confirm date change with witness)	3 Deposition of [REDACTED] Ft. Lauderdale, FL (subpoena served)	4 Deposition of [REDACTED] Ft. Lauderdale, FL (served)
5	6	7 Deposition of [REDACTED] New York, NY (possible date)	8 Deposition of [REDACTED] New York/New Jersey	9 Deposition of [REDACTED] New York, NY	10 Deposition of Rinaldo Rizzo Armonk, NY (confirmed)	11
12	13	14 Deposition of [REDACTED] New York, NY	15 Deposition of Jared Weisfeld/ Sharon Churcher (or find additional date if they will be too long)	16 Deposition of [REDACTED] Armonk, NY	17	18
19	20 Deposition of Detective Joe Recarey Ft. Lauderdale, FL	21 Deposition of [REDACTED] Ft. Lauderdale, FL	22 Deposition of [REDACTED] New York, NY	23	24	25

Virginia Giuffre v. Ghislaine Maxwell

Case no. 15-cv-07433-RWS

26	27	28 Deposition of Emmy Taylor California or London (possible date not served with subpoena yet)	29 (Other California witnesses if needed)	30 Deposition of [REDACTED] (possible date)	
----	----	---	--	---	--

***Week of June 20 – 24 may be bad for Maxwell's counsel (please confirm)

****Week of June 27 – July 1st may be bad for Maxwell's counsel (please confirm)

*****Need to confirm Maxwell will accept service for her agent Ross Gow.

There may be a few other witnesses that we may need to add if they can't confirm attendance at trial.