

# **EXHIBIT E**

BOIES, SCHILLER & FLEXNER LLP

401 EAST LAS OLAS BOULEVARD • SUITE 1200 • FORT LAUDERDALE, FL 33301-2211 • PH. 954.356.0011 • FAX 954.356.0022

Meredith Schultz, Esq.  
E-mail: [mschultz@bsfllp.com](mailto:mschultz@bsfllp.com)

May 23, 2016

VIA E-MAIL

Laura A. Menninger, Esq.  
HADDON, MORGAN AND FOREMAN, P.C.  
150 East 10<sup>th</sup> Avenue  
Denver, Colorado 80203  
[lmenninger@hmflaw.com](mailto:lmenninger@hmflaw.com)

Re: *Giuffre v. Maxwell*  
Case No. 15-cv-07433-RWS

Dear Laura:

This letter is to seek your agreement to produce Ross Gow for deposition, as the agent of your client, Ms. Maxwell. We can work with Mr. Gow's schedule to minimize inconvenience. Please advise by Wednesday, May 25, 2016, whether you will produce Mr. Gow, or whether we will need to seek relief from the Court with respect to his deposition.

Sincerely,

  
Meredith Schultz

MLS:dk



H A D D O N  
M O R G A N  
F O R E M A N

Haddon, Morgan and Foreman, P.C.  
Laura A. Menninger

150 East 10th Avenue  
Denver, Colorado 80203  
PH 303.831.7364 FX 303.832.2628  
www.hmflaw.com  
lmenninger@hmflaw.com

May 25, 2016

**VIA EMAIL**

Meredith Schultz  
Boies, Schiller & Flexner LLP  
401 East Las Olas Blvd., Suite 1200  
Fort Lauderdale, FL 33301  
[mschultz@bsflp.com](mailto:mschultz@bsflp.com)

Re: *Giuffre v. Maxwell*, Case No. 15-cv-07433-RWS

Dear Ms. Schultz:

I am not aware of any legal authority that would allow Ms. Maxwell to “produce” Ross Gow for a deposition and you do not cite to any rule or case that would either enable or require her to do so. If you are aware of any authority for this request please provide it to me and I will consider it.

Sincerely,

HADDON, MORGAN AND FOREMAN, P.C.

/s/ Laura A. Menninger

Laura A. Menninger

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