

Exhibit A

Exhibit A

LaVeglia/TD Bank
TD Bank's ESI Privilege Log

Privilege Beg Num	Privilege End Num	Production Beg Num	Production End Num	Privilege Type	Date	From	To	Subject	Attachment Subject
PRIV0000001	PRIV0000001	TDBANK ESI0002580	TDBANK ESI0002583	Attorney Client	6/15/2018 17:17	Whitehead, Paul <Paul.Whitehead@td.com>	Michor, Susy <Susy.Michor@td.com>	ERE Target Operating Model	
PRIV0000002	PRIV0000002	TDBANK ESI0002576	TDBANK ESI0002579	Attorney Client	6/15/2018 17:13	Michor, Susy <Susy.Michor@td.com>	Whitehead, Paul <Paul.Whitehead@td.com>	ERE Target Operating Model	
PRIV0000003	PRIV0000003			Attorney Work Product	5/7/2018 10:17	Lipse, Jacob <Jacob.Lipse@td.com>	Whitehead, Paul <Paul.Whitehead@td.com>	Legal investigation	
PRIV0000004	PRIV0000004			Attorney Client;Attorney Work Product	5/4/2018 12:51	Lipse, Jacob <Jacob.Lipse@td.com>	Whitehead, Paul <Paul.Whitehead@td.com>	Legal investigation	
PRIV0000005	PRIV0000005			Attorney Work Product	5/4/2018 19:10	Whitehead, Paul <Paul.Whitehead@td.com>	Lipse, Jacob <Jacob.Lipse@td.com>	Legal investigation	
PRIV0000006	PRIV0000006			Attorney Client;Attorney Work Product	5/4/2018 15:04	Whitehead, Paul <Paul.Whitehead@td.com>	Michor, Susy <Susy.Michor@td.com>	Legal investigation	
PRIV0000007	PRIV0000007			Attorney Client;Attorney Work Product	9/4/2018 19:38	Whitehead, Paul <Paul.Whitehead@td.com>	Michor, Susy <Susy.Michor@td.com>	LaVeglia threatened litigation	
PRIV0000008	PRIV0000008			Attorney Client;Attorney Work Product	9/4/2018 17:27	Michor, Susy <Susy.Michor@td.com>	Whitehead, Paul <Paul.Whitehead@td.com>	LaVeglia threatened litigation	
PRIV0000009	PRIV0000009			Attorney Client;Attorney Work Product	8/27/2018 11:54	Gollin, David <David.Gollin@td.com>	Jabaut, Matthew D <Matthew.Jabaut@td.com>; Michor, Susy <Susy.Michor@td.com>; Whitehead, Paul <Paul.Whitehead@td.com>; Strignile, Kimberly A <Kimberly.Strignile@td.com>; Smith, Gregory L <Gregory.L.Smith@td.com>	LaVeglia threatened litigation	

LaVeglia/TD Bank
TD Bank's ESI Privilege Log

PRIV0000010	PRIV0000010			Attorney Client;Attorney Work Product	5/4/2018 14:41	Whitehead, Paul <Paul.Whitehead@td.com>	Michor, Susy <Susy.Michor@td.com>	Legal investigation	
PRIV0000011	PRIV0000011			Attorney Client;Attorney Work Product	9/5/2018 16:19	Michor, Susy <Susy.Michor@td.com>	Whitehead, Paul <Paul.Whitehead@td.com>	LaVeglia threatened litigation	
PRIV0000012	PRIV0000012			Attorney Client;Attorney Work Product	8/20/2018 1:00	David.Gollin@td.com	Paul.Whitehead@td.com	LaVeglia threatened litigation	
PRIV0000013	PRIV0000013			Attorney Client;Attorney Work Product;Prepared In Anticipation Of Litigation	8/27/2018 21:28	Michor, Susy <Susy.Michor@td.com>	Whitehead, Paul <Paul.Whitehead@td.com>	LaVeglia threatened litigation	
PRIV0000014	PRIV0000014			Attorney Client;Attorney Work Product	8/29/2018 16:10	Michor, Susy <Susy.Michor@td.com>	Whitehead, Paul <Paul.Whitehead@td.com>	LaVeglia threatened litigation	
PRIV0000015	PRIV0000015			Attorney Client;Attorney Work Product					Staff Selection Worksheet
PRIV0000016	PRIV0000016			Attorney Work Product					Staff Selection Worksheet
PRIV0000017	PRIV0000017			Attorney Client;Attorney Work Product					Staff Selection Worksheet
PRIV0000018	PRIV0000018			Attorney Client					Staff Selection Worksheet
PRIV0000019	PRIV0000019			Attorney Client;Attorney Work Product	7/31/2018 9:43	Peters, Jennifer M <Jennifer.Peters@td.com>	Hannah, Linda M <Linda.Hannah@td.com>; Jabaut, Matthew D <Matthew.Jabaut@td.com>	LaVeglia demand letter and threatened litigation	

LaVeglia/TD Bank
TD Bank's ESI Privilege Log

PRIV000020	PRIV000020			Attorney Client	12/11/2018 16:42	DiMarco-Jones, Lucia <Lucia.DiMarco-Jones@td.com>	Jabaut, Matthew D <Matthew.Jabaut@td.com>	LaVeglia demand letter and threatened litigation	
PRIV000021	PRIV000021			Attorney Client;Attorney Work Product					Staff Selection Worksheet
PRIV000022	PRIV000022			Attorney Client;Attorney Work Product					Staff Selection Worksheet
PRIV000023	PRIV000023			Attorney Client;Attorney Work Product					Staff Selection Worksheet
PRIV000024	PRIV000024			Attorney Client	8/1/2018 13:20	Jabaut, Matthew D <Matthew.Jabaut@td.com>	Hannah, Linda M <Linda.Hannah@td.com>	LaVeglia demand letter and threatened litigation	
PRIV000025	PRIV000025			Attorney Client;Attorney Work Product					Staff Selection Worksheet
PRIV000026	PRIV000026			Attorney Client;Attorney Work Product					Staff Selection Worksheet
PRIV000027	PRIV000027			Attorney Client	8/13/2018 16:56	DiMarco-Jones, Lucia <Lucia.DiMarco-Jones@td.com>	Gollin, David <David.Gollin@td.com>	LaVeglia demand letter and threatened litigation	
PRIV000028	PRIV000028			Attorney Client					Timeline
PRIV000029	PRIV000029			Privileged per Family Relationship					Staff Selection Worksheet

LaVeglia/TD Bank
TD Bank's ESI Privilege Log

PRIV000030	PRIV000030			Attorney Client;Attorney Work Product					Staff Selection Worksheet
PRIV000031	PRIV000031			Attorney Client;Attorney Work Product					Staff Selection Worksheet
PRIV000032	PRIV000032			Attorney Client;Attorney Work Product					Staff Selection Worksheet
PRIV000033	PRIV000033			Attorney Client;Attorney Work Product					Staff Selection Worksheet
PRIV000034	PRIV000034			Attorney Client;Attorney Work Product					Staff Selection Worksheet
PRIV000035	PRIV000035			Attorney Client;Attorney Work Product					Staff Selection Worksheet
PRIV000036	PRIV000036			Attorney Client;Attorney Work Product					Staff Selection Worksheet
PRIV000037	PRIV000037			Attorney Client;Attorney Work Product	5/24/2018 9:08	Jabaut, Matthew D </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E88E1CD0C7FA49249264C1206D14FE3E-JABAUT, MATTHE9D6C6D>	DiMarco-Jones, Lucia <Lucia.DiMarco-Jones@td.com>; Evans, Amy <Amy.Evans@td.com>	Staff Selection Worksheet	
PRIV000038	PRIV000038			Attorney Client;Attorney Work Product					Staff Selection Worksheet

LaVeglia/TD Bank
TD Bank's ESI Privilege Log

PRIV000039	PRIV000039			Attorney Client;Attorney Work Product	5/29/2018 11:33	Jabaut, Matthew D </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECI PIENTS/CN=E88E1CD0C7FA49 249264C1206D14FE3E- JABAUT, MATTHE9D6C6D>	DiMarco-Jones, Lucia <Lucia.DiMarco-Jones@td.com>; Peters, Jennifer M <Jennifer.Peters@td.com>	ERE Target Operating Model	
PRIV000040	PRIV000040			Attorney Client;Attorney Work Product					Staff Selection Worksheet
PRIV000041	PRIV000041			Attorney Client;Attorney Work Product					Unknown
PRIV000042	PRIV000042			Attorney Client;Attorney Work Product	6/11/2018 16:16	Jabaut, Matthew D </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECI PIENTS/CN=E88E1CD0C7FA49 249264C1206D14FE3E- JABAUT, MATTHE9D6C6D>	DiMarco-Jones, Lucia <Lucia.DiMarco-Jones@td.com>	ERE Staff Selection Worksheet	
PRIV000043	PRIV000043			Attorney Client;Attorney Work Product					Staff Selection Worksheet
PRIV000044	PRIV000044			Attorney Client;Attorney Work Product	5/24/2018 16:58	Jabaut, Matthew D </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECI PIENTS/CN=E88E1CD0C7FA49 249264C1206D14FE3E- JABAUT, MATTHE9D6C6D>	DiMarco-Jones, Lucia <Lucia.DiMarco-Jones@td.com>	ERE Staff Selection Worksheet	
PRIV000045	PRIV000045			Attorney Client;Attorney Work Product					Staff Selection Worksheet

LaVeglia/TD Bank
TD Bank's ESI Privilege Log

PRIV000046	PRIV000046			Attorney Client;Attorney Work Product					ATT41740
PRIV000047	PRIV000047			Attorney Client;Attorney Work Product	6/11/2018 10:05	Jabaut, Matthew D </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E88E1CD0C7FA49249264C1206D14FE3E-JABAUT, MATTHE9D6C6D>	Evans, Amy <Amy.Evans@td.com>; DiMarco-Jones, Lucia <Lucia.DiMarco-Jones@td.com>	ERE Staff Selection Worksheet	
PRIV000048	PRIV000048			Attorney Client;Attorney Work Product					Staff Selection Worksheet
PRIV000049	PRIV000049			Attorney Client;Attorney Work Product	6/11/2018 16:16	Jabaut, Matthew D </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E88E1CD0C7FA49249264C1206D14FE3E-JABAUT, MATTHE9D6C6D>	DiMarco-Jones, Lucia <Lucia.DiMarco-Jones@td.com>	ERE Staff Selection Worksheet	
PRIV000050	PRIV000050			Attorney Client;Attorney Work Product					Staff Selection Worksheet
PRIV000051	PRIV000051			Attorney Client;Attorney Work Product	5/16/2018 10:16	Jabaut, Matthew D </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E88E1CD0C7FA49249264C1206D14FE3E-JABAUT, MATTHE9D6C6D>	DiMarco-Jones, Lucia <Lucia.DiMarco-Jones@td.com>; Lawrence, Serena <Serena.Lawrence@td.com>; Peters, Jennifer M <Jennifer.Peters@td.com>	ERE Staff Selection Worksheet	
PRIV000052	PRIV000052			Attorney Client;Attorney Work Product					Staff Selection Worksheet

LaVeglia/TD Bank
TD Bank's ESI Privilege Log

PRIV0000053	PRIV0000053			Attorney Client;Attorney Work Product					ATT41740
PRIV0000054	PRIV0000054			Attorney Client;Attorney Work Product	4/20/2018 15:11	Jabaut, Matthew D </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECI PIENTS/CN=E88E1CD0C7FA49 249264C1206D14FE3E- JABAUT, MATTHE9D6C6D>	DiMarco-Jones, Lucia <Lucia.DiMarco-Jones@td.com>	ERE Target Operating Model	
PRIV0000055	PRIV0000055			Attorney Client;Attorney Work Product					Staff Selection Worksheet
PRIV0000056	PRIV0000056			Attorney Client;Attorney Work Product	5/1/2018 13:38	Jabaut, Matthew D </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECI PIENTS/CN=E88E1CD0C7FA49 249264C1206D14FE3E- JABAUT, MATTHE9D6C6D>	DiMarco-Jones, Lucia <Lucia.DiMarco-Jones@td.com>; Lawrence, Serena <Serena.Lawrence@td.com>	ERE Target Operating Model-Benefits to laid-off employees	
PRIV0000057	PRIV0000057			Attorney Client;Attorney Work Product					Staff Selection Worksheet
PRIV0000058	PRIV0000058			Attorney Client;Attorney Work Product					Case for Change Powerpoint
PRIV0000059	PRIV0000059			Attorney Client;Attorney Work Product	4/4/2018 10:40	Jabaut, Matthew D </O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECI PIENTS/CN=E88E1CD0C7FA49 249264C1206D14FE3E- JABAUT, MATTHE9D6C6D>	DiMarco-Jones, Lucia <Lucia.DiMarco-Jones@td.com>	ERE Target Operating Model	

LaVeglia/TD Bank
TD Bank's ESI Privilege Log

PRIV0000060	PRIV0000060			Attorney Client;Attorney Work Product					Staff Selection Worksheet
PRIV0000061	PRIV0000061			Attorney Client;Attorney Work Product					Staff Selection Worksheet
PRIV0000062	PRIV0000062			Attorney Client;Attorney Work Product	8/10/2018 13:53	Jabaut, Matthew D <Matthew.Jabaut@td.com>	DiMarco-Jones, Lucia <Lucia.DiMarco-Jones@td.com>	ERE Staff Selection Worksheet	
PRIV0000063	PRIV0000063			Attorney Client;Attorney Work Product					Staff Selection Worksheet
PRIV0000064	PRIV0000064			Attorney Client;Attorney Work Product					Staff Selection Worksheet
PRIV0000065	PRIV0000065			Attorney Client	7/31/2018 9:45	DiMarco-Jones, Lucia <Lucia.DiMarco-Jones@td.com>	Peters, Jennifer M <Jennifer.Peters@td.com>; Hannah, Linda M <Linda.Hannah@td.com>; Jabaut, Matthew D <Matthew.Jabaut@td.com>	LaVeglia demand letter and threatened litigation	
PRIV0000066	PRIV0000066			Attorney Client;Attorney Work Product					Staff Selection Worksheet
PRIV0000067	PRIV0000067			Attorney Client;Attorney Work Product					Staff Selection Worksheet
PRIV0000068	PRIV0000068			Attorney Client;Attorney Work Product	9/4/2018 12:44	Michor, Susy <Susy.Michor@td.com>	Strignile, Kimberly A <Kimberly.Strignile@td.com>; Tucker, Quinton L <Quinton.Tucker@td.com>	LaVeglia demand letter and threatened litigation	

LaVeglia/TD Bank
TD Bank's ESI Privilege Log

PRIV000069	PRIV000069			Attorney Client	8/1/2018 11:33	Hannah, Linda M <Linda.Hannah@td.com>	Jabaut, Matthew D <Matthew.Jabaut@td.com>	LaVeglia demand letter and threatened litigation	
PRIV000070	PRIV000070			Attorney Client;Attorney Work Product	8/15/2018 11:45	David.Gollin@td.com	Matthew.Jabaut@td.com	LaVeglia threatened litigation	
PRIV000071	PRIV000071			Attorney Client;Attorney Work Product	9/4/2018 14:17	Strignile, Kimberly A <Kimberly.Strignile@td.com>	Michor, Susy <Susy.Michor@td.com>; Tucker, Quinton L <Quinton.Tucker@td.com>	LaVeglia threatened litigation	
PRIV000072	PRIV000072			Attorney Client;Attorney Work Product	8/20/2018 1:00	David.Gollin@td.com	Serena.Lawrence@td.com	LaVeglia threatened litigation	
PRIV000073	PRIV000073			Attorney Client;Attorney Work Product					Staff Selection Worksheet
PRIV000074	PRIV000074			Attorney Client;Attorney Work Product	8/20/2018 6:26	Lawrence, Serena <Serena.Lawrence@td.com>	Michor, Susy <Susy.Michor@td.com>	LaVeglia threatened litigation	
PRIV000075	PRIV000075			Attorney Client;Attorney Work Product	8/15/2018 14:19	Michor, Susy <Susy.Michor@td.com>	Strignile, Kimberly A <Kimberly.Strignile@td.com>	LaVeglia threatened litigation	
PRIV000076	PRIV000076			Attorney Client;Attorney Work Product	8/15/2018 11:45	David.Gollin@td.com	Serena.Lawrence@td.com	LaVeglia threatened litigation	
PRIV000077	PRIV000077			Attorney Client;Attorney Work Product	8/27/2018 21:27	Michor, Susy <Susy.Michor@td.com>	Lawrence, Serena <Serena.Lawrence@td.com>	LaVeglia threatened litigation	
PRIV000078	PRIV000078	TDBANK ESI0001319	TDBANK ESI0001321	Attorney Client;Attorney Work Product	5/4/2018 8:13	Lawrence, Serena <Serena.Lawrence@td.com>	Michor, Susy <Susy.Michor@td.com>; DeAngelo, Amy <Amy.DeAngelo@td.com>	Staff Selection Worksheet	

LaVeglia/TD Bank
TD Bank's ESI Privilege Log

PRIV0000079	PRIV0000079			Attorney Client;Attorney Work Product					Staff Selection Worksheet
PRIV0000080	PRIV0000080			Attorney Client	8/15/2018 15:14	Tucker, Quinton L <Quinton.Tucker@td.com>	Michor, Susy <Susy.Michor@td.com>; Strignile, Kimberly A <Kimberly.Strignile@td.com>	LaVeglia threatened litigation	
PRIV0000081	PRIV0000081			Attorney Client;Attorney Work Product	9/5/2018 13:27	Strignile, Kimberly A <Kimberly.Strignile@td.com>	Jabaut, Matthew D <Matthew.Jabaut@td.com>	LaVeglia threatened litigation	
PRIV0000082	PRIV0000082			Attorney Client;Attorney Work Product	5/6/2018 22:01	Michor, Susy <Susy.Michor@td.com>	Telford, Megan <megan.telford@td.com>	Legal investigation	
PRIV0000083	PRIV0000083			Attorney Client	6/15/2018 16:47	Young, Jennifer (SVP HR) <Jennifer.A.Young@td.com>	Michor, Susy <Susy.Michor@td.com>	LaVeglia threatened litigation	
PRIV0000084	PRIV0000084			Attorney Work Product	5/6/2018 21:58	Michor, Susy <Susy.Michor@td.com>	Telford, Megan <megan.telford@td.com>	Legal investigation	
PRIV0000085	PRIV0000085			Attorney Work Product	5/6/2018 22:00	Telford, Megan <megan.telford@td.com>	Michor, Susy <Susy.Michor@td.com>	Legal investigation	
PRIV0000086	PRIV0000086			Attorney Client;Attorney Work Product	8/27/2018 21:26	Michor, Susy <Susy.Michor@td.com>	Strignile, Kimberly A <Kimberly.Strignile@td.com>; Tucker, Quinton L <Quinton.Tucker@td.com>	LaVeglia threatened litigation	
PRIV0000087	PRIV0000087			Attorney Client;Attorney Work Product	8/20/2018 1:00	David.Gollin@td.com	Susy.Michor@td.com	LaVeglia threatened litigation	
PRIV0000088	PRIV0000088			Attorney Work Product	5/6/2018 22:01	Michor, Susy <Susy.Michor@td.com>	Telford, Megan <megan.telford@td.com>	Legal investigation	
PRIV0000089	PRIV0000089			Attorney Work Product	5/6/2018 21:56	Michor, Susy <Susy.Michor@td.com>	Telford, Megan <megan.telford@td.com>	Legal investigation	

LaVeglia/TD Bank
TD Bank's ESI Privilege Log

PRIV0000090	PRIV0000090			Attorney Client;Attorney Work Product	8/29/2018 11:41	Strignile, Kimberly A <Kimberly.Strignile@td.com>	Michor, Susy <Susy.Michor@td.com>; Tucker, Quinton L <Quinton.Tucker@td.com>	LaVeglia threatened litigation	
PRIV0000091	PRIV0000091			Attorney Client;Attorney Work Product	8/20/2018 9:58	Dela Cruz, Janet <Janet.DelaCruz@td.com>	Michor, Susy <Susy.Michor@td.com>	LaVeglia threatened litigation	
PRIV0000092	PRIV0000092			Attorney Client;Attorney Work Product	8/27/2018 20:05	Michor, Susy <Susy.Michor@td.com>	Strignile, Kimberly A <Kimberly.Strignile@td.com>; Tucker, Quinton L <Quinton.Tucker@td.com>	LaVeglia threatened litigation	
PRIV0000093	PRIV0000093			Attorney Client;Attorney Work Product	8/20/2018 9:13	Michor, Susy <Susy.Michor@td.com>	Dela Cruz, Janet <Janet.DelaCruz@td.com>; Tucker, Quinton L <Quinton.Tucker@td.com>	LaVeglia threatened litigation	
PRIV0000094	PRIV0000094			Attorney Work Product	5/6/2018 21:59	Telford, Megan <megan.telford@td.com>	Michor, Susy <Susy.Michor@td.com>	Legal investigation	
PRIV0000095	PRIV0000095			Attorney Work Product	5/6/2018 22:04	Michor, Susy <Susy.Michor@td.com>	Telford, Megan <megan.telford@td.com>	Legal investigation	
PRIV0000096	PRIV0000096			Attorney Client;Attorney Work Product	8/29/2018 12:12	Michor, Susy <Susy.Michor@td.com>	Strignile, Kimberly A <Kimberly.Strignile@td.com>; Tucker, Quinton L <Quinton.Tucker@td.com>	LaVeglia threatened litigation	
PRIV0000097	PRIV0000097			Attorney Client;Attorney Work Product	9/5/2018 16:19	Michor, Susy <Susy.Michor@td.com>	Strignile, Kimberly A <Kimberly.Strignile@td.com>	LaVeglia threatened litigation	
PRIV0000098	PRIV0000098			Attorney Work Product	5/6/2018 22:02	Telford, Megan <megan.telford@td.com>	Michor, Susy <Susy.Michor@td.com>	Legal investigation	
PRIV0000099	PRIV0000099			Attorney Work Product	5/6/2018 21:57	Telford, Megan <megan.telford@td.com>	Michor, Susy <Susy.Michor@td.com>	Legal investigation	

LaVeglia/TD Bank
TD Bank's ESI Privilege Log

PRIV0000100	PRIV0000100			Attorney Client;Attorney Work Product	9/5/2018 14:01	Strignile, Kimberly A <Kimberly.Strignile@td.com>	Michor, Susy <Susy.Michor@td.com>	LaVeglia threatened litigation	
PRIV0000101	PRIV0000101			Attorney Client;Attorney Work Product	9/5/2018 13:55	Michor, Susy <Susy.Michor@td.com>	Strignile, Kimberly A <Kimberly.Strignile@td.com>	LaVeglia threatened litigation	
PRIV0000102	PRIV0000102	TDBANK ESI0001732	TDBANK ESI0001735	Attorney Client	6/15/2018 17:12	Michor, Susy <Susy.Michor@td.com>	Young, Jennifer (SVP HR) <Jennifer.A.Young@td.com>	ERE Target Operating Model	
PRIV0000103	PRIV0000103			Attorney Client;Attorney Work Product	8/27/2018 20:15	Strignile, Kimberly A <Kimberly.Strignile@td.com>	Michor, Susy <Susy.Michor@td.com>; Tucker, Quinton L <Quinton.Tucker@td.com>	LaVeglia threatened litigation	
PRIV0000104	PRIV0000104			Attorney Client;Attorney Work Product	8/27/2018 18:09	Michor, Susy <Susy.Michor@td.com>	Strignile, Kimberly A <Kimberly.Strignile@td.com>; Tucker, Quinton L <Quinton.Tucker@td.com>	LaVeglia threatened litigation	
PRIV0000105	PRIV0000105			Attorney Client;Attorney Work Product	9/5/2018 13:28	Strignile, Kimberly A <Kimberly.Strignile@td.com>	Michor, Susy <Susy.Michor@td.com>	LaVeglia threatened litigation	
PRIV0000106	PRIV0000106			Attorney Client;Attorney Work Product	8/27/2018 19:57	Strignile, Kimberly A <Kimberly.Strignile@td.com>	Michor, Susy <Susy.Michor@td.com>; Tucker, Quinton L <Quinton.Tucker@td.com>	LaVeglia threatened litigation	
PRIV0000107	PRIV0000107			Attorney Client;Attorney Work Product	9/5/2018 13:20	Jabaut, Matthew D <Matthew.Jabaut@td.com>	Strignile, Kimberly A <Kimberly.Strignile@td.com>	LaVeglia threatened litigation	
PRIV0000108	PRIV0000108			Attorney Client;Attorney Work Product	8/29/2018 16:56	Whitehead, Paul <Paul.Whitehead@td.com>	Michor, Susy <Susy.Michor@td.com>	LaVeglia threatened litigation	

LaVeglia/TD Bank
TD Bank's ESI Privilege Log

PRIV0000109	PRIV0000109			Attorney Client;Attorney Work Product	8/15/2018 11:45	David.Gollin@td.com	Paul.Whitehead@td.com	LaVeglia threatened litigation	
PRIV0000110	PRIV0000110			Attorney Work Product	5/4/2018 18:38	Lipsey, Jacob <Jacob.Lipsey@td.com>	Whitehead, Paul <Paul.Whitehead@td.com>	Legal investigation	
PRIV0000111	PRIV0000111			Attorney Work Product	5/4/2018 16:09	Lipsey, Jacob <Jacob.Lipsey@td.com>	Whitehead, Paul <Paul.Whitehead@td.com>	Legal investigation	
PRIV0000112	PRIV0000112			Attorney Client;Attorney Work Product	5/4/2018 14:40	Michor, Susy <Susy.Michor@td.com>	Whitehead, Paul <Paul.Whitehead@td.com>	Legal investigation	
PRIV0000113	PRIV0000113			Attorney Client;Attorney Work Product	5/4/2018 13:18	Lipsey, Jacob <Jacob.Lipsey@td.com>	Whitehead, Paul <Paul.Whitehead@td.com>	Legal investigation	
PRIV0000114	PRIV0000114			Attorney Client;Attorney Work Product	8/27/2018 12:01	Whitehead, Paul <Paul.Whitehead@td.com>	Michor, Susy <Susy.Michor@td.com>	LaVeglia demand letter and threatened litigation	
PRIV0000115	PRIV0000115			Attorney Client	6/15/2018 17:54	Whitehead, Paul <Paul.Whitehead@td.com>	Michor, Susy <Susy.Michor@td.com>	ERE Target Operating Model	
PRIV0000116	PRIV0000116			Attorney Work Product	5/4/2018 16:06	Whitehead, Paul <Paul.Whitehead@td.com>	Lipsey, Jacob <Jacob.Lipsey@td.com>	Legal investigation	
PRIV0000117	PRIV0000117			Attorney Client;Attorney Work Product	5/4/2018 13:14	Whitehead, Paul <Paul.Whitehead@td.com>	Lipsey, Jacob <Jacob.Lipsey@td.com>	Legal investigation	
PRIV0000118	PRIV0000118			Attorney Client;Attorney Work Product	5/4/2018 14:19	Whitehead, Paul <Paul.Whitehead@td.com>	Michor, Susy <Susy.Michor@td.com>	Legal investigation	
PRIV0000119	PRIV0000119			Attorney Client;Attorney Work Product	9/5/2018 13:04	Strignile, Kimberly A <Kimberly.Strignile@td.com>	Jabaut, Matthew D <Matthew.Jabaut@td.com>	LaVeglia threatened litigation	

LaVeglia/TD Bank
TD Bank's ESI Privilege Log

PRIV0000120	PRIV0000120			Attorney Client;Attorney Work Product	7/30/2018 16:34	Jabaut, Matthew D <Matthew.Jabaut@td.com>	Strignile, Kimberly A <Kimberly.Strignile@td.com>	LaVeglia threatened litigation	
PRIV0000121	PRIV0000121			Attorney Client;Attorney Work Product					LaVeglia threatened litigation
PRIV0000122	PRIV0000122			Attorney Client;Attorney Work Product	7/30/2018 16:31	Ceccanecchio, David J <David.Ceccanecchio@td.com>	Peters, Jennifer M <Jennifer.Peters@td.com>; Sufas, Allison N <Allison.Sufas@td.com>	LaVeglia threatened litigation	
PRIV0000123	PRIV0000123			Attorney Client;Attorney Work Product					LaVeglia threatened litigation
PRIV0000124	PRIV0000124			Attorney Client;Attorney Work Product	8/20/2018 9:13	Michor, Susy <Susy.Michor@td.com>	Lawrence, Serena <Serena.Lawrence@td.com>	LaVeglia threatened litigation	
PRIV0000125	PRIV0000125			Attorney Client;Attorney Work Product	8/20/2018 9:26	Lawrence, Serena <Serena.Lawrence@td.com>	Michor, Susy <Susy.Michor@td.com>	LaVeglia threatened litigation	
PRIV0000126	PRIV0000126			Attorney Client;Attorney Work Product	9/5/2018 12:38	Michor, Susy <Susy.Michor@td.com>	Strignile, Kimberly A <Kimberly.Strignile@td.com>	LaVeglia threatened litigation	
PRIV0000127	PRIV0000127			Attorney Client;Attorney Work Product	8/15/2018 11:45	David.Gollin@td.com	Susy.Michor@td.com	LaVeglia threatened litigation	
PRIV0000128	PRIV0000128	TDBANK ESI0001728	TDBANK ESI0001731	Attorney Client	6/15/2018 16:39	Michor, Susy <Susy.Michor@td.com>	Young, Jennifer (SVP HR) <Jennifer.A.Young@td.com>	ERE Target Operating Model	

Exhibit B

Exhibit B

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JASON LAVEGLIA,	:	
	:	
Plaintiff,	:	Case No. 2:19-CV-01917-GEKP
	:	
v.	:	
	:	
TD BANK, N.A.,	:	
	:	
Defendant.	:	

DEFENDANT’S INITIAL DISCLOSURES

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendant TD Bank, N.A. (“TD Bank” or “Defendant”), by and through its undersigned counsel, hereby makes the following Initial Disclosures to Plaintiff Jason LaVeglia (“Plaintiff”). TD Bank reserves its right to amend, revise and/or supplement these Initial Disclosures.

I. WITNESSES

Pursuant to Rule 26(a)(1)(A), TD Bank identifies the following individuals who are likely to have discoverable information concerning the allegations in the Complaint and upon whom TD Bank may rely in its defense of this action.

Name, Address, and Telephone Number	Information
Jason LaVeglia c/o Harold I. Goodman, Esquire & Noah Goodman, Esquire Raynes Lawn Helmeyer 1845 Walnut Street, 20th Floor Philadelphia, PA 19103 Telephone No.: 215-568-6190 Facsimile No.: 215-988-0618	Knowledge of matters alleged in the Complaint and matters relating to: his employment with TD Bank; his job responsibilities; his leave of absence; his family members’ medical conditions; and the circumstances that led to the end of his employment.

<p>Paul Whitehead c/o Rachel Fendell Satinsky, Esq. Littler Mendelson, P.C. 1601 Cherry Street, Suite 1400 Philadelphia, PA 19102 (267) 402-3000 rsatinsky@littler.com</p>	<p>Knowledge of matters alleged in the Complaint and matters relating to: Plaintiff’s employment with TD Bank; TD Bank’s policies and procedures; Plaintiff’s role and performance; and the circumstances that led to the end of Plaintiff’s employment.</p>
<p>Matthew Jabaut c/o Rachel Fendell Satinsky, Esq. Littler Mendelson, P.C. 1601 Cherry Street, Suite 1400 Philadelphia, PA 19102 (267) 402-3000 rsatinsky@littler.com</p>	<p>Knowledge of matters alleged in the Complaint and matters relating to: Plaintiff’s employment with TD Bank; TD Bank’s policies and procedures; and the circumstances that led to the end of Plaintiff’s employment.</p>

II. DOCUMENTS

Pursuant to Rule 26(a)(1)(B), TD Bank sets forth below a listing of categories of documents and tangible things relevant to disputed facts alleged with particularity in the pleadings. TD Bank’s investigation is ongoing, and therefore, TD Bank will supplement these Initial Disclosures if it uncovers any additional documents or tangible things that it will use to support its defenses in this matter.

1. Plaintiff’s personnel file;
2. TD Bank’s Advice Channel records involving and relating to Plaintiff;
3. Staff Selection Worksheets;
4. Mr. LaVeglia’s Severance Agreement and General Release;
5. TD Bank’s Parental Leave Policy, Equal Opportunity Policy Statement, Harassment and Discrimination-Free Work Environment Policy, and Standards of Conduct Policy; and
6. TD Bank’s Code of Conduct and Ethics.

III. COMPUTATION OF DAMAGES

None.

IV. INSURANCE AGREEMENTS

None.

/s/ Rachel Fendell Satinsky

Rachel Fendell Satinsky (PA No. 308751)

LITTLER MENDELSON, P.C.

Three Parkway, Suite 1400

1601 Cherry Street

Philadelphia, PA 19102

(267) 402-3000 (t)

(267) 402-3131 (f)

rsatinsky@littler.com

Attorneys for Defendant

Dated: July 15, 2019

CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that on this 15th day of July, 2019, a true and correct copy of Defendant's Initial Disclosures was served via email, upon the following:

Harold I. Goodman, Esquire & Noah Goodman, Esquire
Raynes Lawn Hehmeyer
1845 Walnut Street, 20th Floor
Philadelphia, PA 19103
HIGoodman@rayneslaw.com
NJGoodman@rayneslaw.com

Attorneys for Plaintiff

/s/ Rachel Fendell Satinsky
Rachel Fendell Satinsky

Dated: July 15, 2019

Exhibit C

Exhibit C

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JASON LAVEGLIA,	:	
	:	
Plaintiff,	:	Case No. 2:19-CV-01917-GEKP
	:	
v.	:	
	:	
TD BANK, N.A.,	:	
	:	
Defendant.	:	

DEFENDANT’S AMENDED INITIAL DISCLOSURES

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendant TD Bank, N.A. (“TD Bank” or “Defendant”), by and through its undersigned counsel, hereby makes the following Amended Initial Disclosures to Plaintiff Jason LaVeglia (“Plaintiff”). TD Bank reserves its right to amend, revise and/or supplement these Amended Initial Disclosures.

I. WITNESSES

Pursuant to Rule 26(a)(1)(A), TD Bank identifies the following individuals who are likely to have discoverable information concerning the allegations in the Complaint and upon whom TD Bank may rely in its defense of this action.

Name, Address, and Telephone Number	Information
Jason LaVeglia c/o Harold I. Goodman, Esquire & Noah Goodman, Esquire Raynes Lawn Hehmeyer 1845 Walnut Street, 20th Floor Philadelphia, PA 19103 Telephone No.: 215-568-6190 Facsimile No.: 215-988-0618	Knowledge of matters alleged in the Complaint and matters relating to: his employment with TD Bank; his job responsibilities; his leave of absence; his family members’ medical conditions; and the circumstances that led to the end of his employment.

<p>Paul Whitehead c/o Rachel Fendell Satinsky, Esq. Littler Mendelson, P.C. 1601 Cherry Street, Suite 1400 Philadelphia, PA 19102 (267) 402-3000 rsatinsky@littler.com</p>	<p>Knowledge of matters alleged in the Complaint and matters relating to: Plaintiff’s employment with TD Bank; TD Bank’s policies and procedures; Plaintiff’s role and performance; and the circumstances that led to the end of Plaintiff’s employment.</p>
<p>Matthew Jabaut c/o Rachel Fendell Satinsky, Esq. Littler Mendelson, P.C. 1601 Cherry Street, Suite 1400 Philadelphia, PA 19102 (267) 402-3000 rsatinsky@littler.com</p>	<p>Knowledge of matters alleged in the Complaint and matters relating to: Plaintiff’s employment with TD Bank; TD Bank’s policies and procedures; and the circumstances that led to the end of Plaintiff’s employment.</p>
<p>Michael Gould c/o Rachel Fendell Satinsky, Esq. Littler Mendelson, P.C. 1601 Cherry Street, Suite 1400 Philadelphia, PA 19102 (267) 402-3000 rsatinsky@littler.com</p>	<p>Knowledge of matters alleged in the Complaint and matters relating to: Plaintiff’s employment with TD Bank; the 2017-2018 Target Optimization Model and related process for TD Bank’s Enterprise Real Estate Group.</p>

II. DOCUMENTS

Pursuant to Rule 26(a)(1)(B), TD Bank sets forth below a listing of categories of documents and tangible things relevant to disputed facts alleged with particularity in the pleadings. TD Bank’s investigation is ongoing, and therefore, TD Bank will supplement these Amended Initial Disclosures if it uncovers any additional documents or tangible things that it will use to support its defenses in this matter.

1. Plaintiff’s personnel file;
2. TD Bank’s Advice Channel records involving and relating to Plaintiff;
3. TD Bank’s Role Charters developed during the 2017-2018 Target Optimization model;

4. TD Bank's Case for Change developed during the 2017-2018 Target Optimization Model;
5. TD Bank's Parental Leave Policy, Equal Opportunity Policy Statement, Harassment and Discrimination-Free Work Environment Policy, and Standards of Conduct Policy; and
6. TD Bank's Code of Conduct and Ethics.

III. COMPUTATION OF DAMAGES

None.

IV. INSURANCE AGREEMENTS

None.

/s/ Rachel Fendell Satinsky

Rachel Fendell Satinsky (PA No. 308751)

LITTLER MENDELSON, P.C.

Three Parkway, Suite 1400

1601 Cherry Street

Philadelphia, PA 19102

(267) 402-3000 (t)

(267) 402-3131 (f)

rsatinsky@littler.com

Attorneys for Defendant

Dated: November 21, 2019

CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that on this 21st day of November, 2019, a true and correct copy of Defendant's Amended Initial Disclosures was served via email, upon the following:

Harold I. Goodman, Esquire
Noah Goodman, Esquire
Raynes Lawn Hehmeyer
1845 Walnut Street, 20th Floor
Philadelphia, PA 19103
HIGoodman@rayneslaw.com
NJGoodman@rayneslaw.com

Attorneys for Plaintiff

/s/ Rachel Fendell Satinsky
Rachel Fendell Satinsky

Dated: November 21, 2019

Exhibit D

Exhibit D

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JASON LAVEGLIA,	:	
	:	
Plaintiff,	:	Case No. 2:19-CV-01917
v.	:	
	:	
TD BANK, N.A.,	:	
	:	
Defendant.	:	

DEFENDANT’S FIRST SUPPLEMENTAL ANSWERS TO PLAINTIFF’S FIRST SET OF INTERROGATORIES

Defendant TD Bank, N.A. (“TD Bank”), by and through its undersigned counsel, submits the following answers to Plaintiff Jason LaVeglia’s First Set of Interrogatories pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure.

GENERAL OBJECTIONS

TD Bank incorporates by reference the General Objections included in its Responses to Plaintiff’s First Set of Interrogatories.

SUPPLEMENTAL INTERROGATORY ANSWERS

5. Describe in detail the basis of the Bank’s decision to approve plaintiff LaVeglia’s leave of absence from May 26, 2018 through September 7, 2018, and identify each person who participated in that decision.

SUPPLEMENTAL ANSWER: Pursuant to Federal Rule of Civil Procedure 33(d), TD Bank refers to the documents produced at Bates numbers TD000871 to TD000877.

6. Describe in detail each communication that the following individuals had with plaintiff LaVeglia regarding his request for a leave of absence from the Bank: (a) Paul Whitehead; (b) Matthew Jabaut; and (c) Serena Lawrence.

SUPPLEMENTAL ANSWER: Pursuant to Federal Rule of Civil Procedure 33(d), TD Bank refers to the document produced at Bates number TDBANKESI002164. Additionally, TD Bank refers to Mr. Whitehead’s deposition testimony regarding this subject.

7. Identify each person who participated in “[t]he restructuring and target operational review of the ERE team.” *See* JL 0217.

SUPPLEMENTAL ANSWER: In addition to the information provided in TD Bank's first set of responses, pursuant to Federal Rule of Civil Procedure 33(d), TD Bank refers generally to the documents produced by TD Bank and PriceWaterhouseCoopers in this litigation.

10. Describe in detail the basis for the Bank's decision to eliminate plaintiff LaVeglia's position as "Head of Enterprise Real Estate Operations." See TD Bank's Answer to the Compl. ¶ 1.

SUPPLEMENTAL ANSWER: In addition to the information provided in TD Bank's first set of responses, pursuant to Federal Rule of Civil Procedure 33(d), TD Bank refers generally to the documents produced by TD Bank and PriceWaterhouseCoopers in this litigation.

11. Identify each person who participated in the Bank's decision to terminate plaintiff LaVeglia's employment and state his or her national origin.

SUPPLEMENTAL ANSWER: Paul Whitehead. Mr. Whitehead has dual-citizenship in The United States and Canada. The Bank does not track employees' national origin information, and therefore, cannot respond specifically as to Mr. Whitehead's national origin.

13. Describe in detail the basis for the Bank's decision to terminate plaintiff LaVeglia's employment from the Bank.

SUPPLEMENTAL ANSWER: In addition to the information provided in TD Bank's first set of responses, pursuant to Federal Rule of Civil Procedure 33(d), TD Bank refers to its position statement produced in response to Mr. LaVeglia's EEOC Charge of Discrimination. TD Bank also refers generally to the documents produced by TD Bank and PriceWaterhouseCoopers in this litigation.

Dated: October 25, 2019

/s/ Rachel Fendell Satinsky
Rachel Fendell Satinsky
LITTLER MENDELSON, P.C.
Three Parkway
1601 Cherry Street, Suite 1400
Philadelphia, PA 19102.1321
267.402.3000 (telephone)
267.402.3131 (facsimile)
rsatinsky@littler.com

Attorneys for Defendant

CERTIFICATE OF SERVICE

I, Rachel Fendell Satinsky, hereby certify that I caused a true and correct copy of the foregoing DEFENDANT'S FIRST SUPPLEMENTAL ANSWERS TO PLAINTIFF'S FIRST SET OF INTERROGATORIES, to be served by email upon:

Harold I. Goodman, Esquire & Noah Goodman, Esquire
Raynes Lawn Hehmeyer
1845 Walnut Street, 20th Floor
Philadelphia, PA 19103
HIGoodman@rayneslaw.com
NJGoodman@rayneslaw.com

Attorneys for Plaintiff

/s/ Rachel Fendell Satinsky
Rachel Fendell Satinsky

Dated: October 25, 2019

Exhibit E

Exhibit E

**RAYNES LAWN
HEHMEYER**

◆
TRIAL LAWYERS

Harold I. Goodman, Esquire
E-mail: higoodman@rayneslaw.com

Noah J. Goodman, Esquire
E-mail: njgoodman@rayneslaw.com

October 30, 2019

VIA E-MAIL: RSatinsky@littler.com

Rachel Fendell Satinsky, Esquire
Littler Mendelson, P.C.
Three Parkway
1601 Cherry Street, Suite 1400
Philadelphia, PA 19102

**Re: Jason LaVeglia v. TD Bank, N.A.
Civil Action No.: 19-CV-01917-JDW**

Dear Rachel:

Thank you for your letter of October 25, 2019. It resolves some of the concerns we described in our letters dated October 11, 14 and 18, 2019, but still leaves the following issues for resolution either by the parties *inter se* or by the Court.

I. TD Bank's Privilege Log

We have reviewed the Bank's log again and come away with the same conclusion as we reached in our October 11th letter, *viz*, the Bank has not shown that the at-issue documents are protected by either the attorney-client privilege or the work-product doctrine. For one thing, many of the referenced documents on the log do not reference or identify the involvement of an attorney (*see, e.g.*, Nos. 0000006-8; 10-11; 13-18; 20-26; and 30-36). For another, the log provides no indication -- as required by the caselaw -- that the communication was made "for the express purpose of securing legal not business advice." Sodexomagic, LLC v. Drexel Univ., 291 F. Supp. 3d 681, 684 (E.D.Pa. 2018). Thus, though

REPLY TO:
1845 Walnut Street, 20th Floor
Philadelphia, PA 19103
215-568-6190 Fax 215-988-0618
www.rayneslaw.com

One Greentree Centre
10,000 Lincoln Drive East
Suite 201
Marlton, NJ 08053
856-854-1556

**RAYNES LAWN
HEHMEYER**

TRIAL LAWYERS

Rachel Fendell Satinsky, Esquire
Littler Mendelson, P.C.
October 30, 2019
Page 2

lawyers are sometimes listed on TD Bank's log, there is nothing to indicate that they were asked to provide, or did provide, legal advice. *See, e.g.*, the entries relative to "Staff Selection Worksheets."¹

For these reasons, unless we can resolve this issue amicably, we intend to file a motion for the production of all the documents on the Bank's privilege log, save for the documents sent to or received by David Gollin and David Ceccaneccho.

II. TD Bank's Supplemental Answers to Plaintiff's First Set of Interrogatories

Thank you for the Supplemental Answers to our Interrogatories. However, several need more specificity, *i.e.*, the Bank's Supplemental Answers to Interrogatory Nos. 6, 7, 10 and 13. Moreover, although the Bank may not track employees' national origin, the number of persons "who participated in the Bank's decision to terminate plaintiff LaVeglia's employment" -- Interrogatory No. 11 -- is less than a handful. In light of that, we believe the Bank can easily answer this Interrogatory. Finally, the Bank did not provide us with a Verification to its Supplemental Answers.

III. The John Dawson Documents

As you know, for the first time in this litigation, Mr. Whitehead testified at his deposition that he himself drew to the attention of the Bank's HR Department the allegation

¹ One other important point about the Staff Selection Worksheets. In the Bank's Initial Rule 26(a)(1) Disclosures, it affirmatively stated its intent to use those sheets "to support its defenses in this matter." Thus, even if the attorney-client privilege attached to those documents, it has been waived by the Bank.

**RAYNES LAWN
HEHMEYER**

◆
TRIAL LAWYERS

Rachel Fendell Satinsky, Esquire
Littler Mendelson, P.C.
October 30, 2019
Page 3

(unfounded) that Mr. LaVeglia “bullied” Mr. Dawson. In my October 18th letter, I asked you to provide us with all the documents regarding that complaint (whether by Mr. Whitehead or Mr. Dawson), “including any documents related to the investigation or results of that complaint.” You have agreed to do so but on the condition that we treat those documents as confidential and only use them for purposes of this litigation. We agree with your request.

IV. Text Messages

We requested text messages from Mr. Whitehead, Mr. Gould, Mr. Jabaut and Ms. Lawrence because they all participated in the decision to eliminate Mr. LaVeglia’s position and terminate his employment from the Bank. If, as you say in your October 25th letter, that Mr. Whitehead and Mr. Gould have searched for any such text messages after their depositions and found none, please submit certifications to us from each of them. As for Mr. Ahmed -- whose cell phone number was redacted in one of his e-mails to Mr. Whitehead -- he too should search for relevant text messages. Likewise, Mr. Jabaut and Ms. Lawrence should conduct their own searches for text messages relative to the claims and defenses that have been raised by the parties.

V. The Depositions of Mr. Ahmed and Ms. Lawrence

I think we now have an agreement on the scope of Mr. Ahmed’s deposition. As for Ms. Lawrence, please let me know if she is available on November 25th, the same day I am scheduled to depose Mr. Ahmed.

* * *

**RAYNES LAWN
HEHMEYER**

◆
TRIAL LAWYERS

Rachel Fendell Satinsky, Esquire
Littler Mendelson, P.C.
October 30, 2019
Page 4

Thanks in advance for your reply to this letter. I would appreciate receiving it by next Tuesday, November 5, 2019. If we cannot resolve the pending issues by then, we will file a motion to compel -- which we prefer to avoid unless necessary.

Sincerely yours,



Harold I. Goodman
Noah J. Goodman

HIG/rcm

cc: Donald W. Myers, Esquire (Via E-mail: DWMyers@littler.com)

Exhibit F

Exhibit F

Noah Goodman

From: Harold Goodman
Sent: Monday, October 7, 2019 7:23 AM
To: Satinsky, Rachel F.; Myers, Donald (DWMyers@littler.com)
Cc: Noah Goodman
Subject: RE: Serena Lawrence

Rachel, please let me know Ms. Lawrence's availability on November 14th in Toronto. That's the same day I'll be deposing Mr. Ahmed. Thanks.

From: Satinsky, Rachel F. [mailto:RSatinsky@littler.com]
Sent: Friday, October 04, 2019 9:35 AM
To: Harold Goodman; noah@ivyleaguekids.com
Subject: Serena Lawrence

Harold and Noah,

Please be advised that Littler **will** be representing Serena Lawrence in connection with any deposition in this case. Any communication related to Serena, therefore, must be through Littler. Please propose potential dates for her deposition in Toronto.

Rachel

Rachel Fendell Satinsky
Shareholder
267.402.3071 direct, 267.285.2566 fax
RSatinsky@littler.com



Fueled by ingenuity. Inspired by you.

Labor & Employment Law Solutions | Local Everywhere
Three Parkway, 1601 Cherry Street, Suite 1400, Philadelphia, PA 19102-1321

This email may contain confidential and privileged material for the sole use of the intended recipient(s). Any review, use, distribution or disclosure by others is strictly prohibited. If you are not the intended recipient (or authorized to receive for the recipient), please contact the sender by reply email and delete all copies of this message.

Littler Mendelson, P.C. is part of the international legal practice Littler Global, which operates worldwide through a number of separate legal entities. Please visit www.littler.com for more information.