EXHIBIT A

Handman, Laura

From:	Kevin Marino <kmarino@khmarino.com>
Sent:	Wednesday, December 30, 2015 2:24 PM
To:	Bruce Rosen; Handman, Laura
Cc:	Larry Klayman; Ratner, Micah; Brian.Toth@hklaw.com; Sandy.Bohrer@hklaw.com; John Boyle; Dina James (daj142182@gmail.com) (daj142182@gmail.com)
Subject:	RE: Stipulation, Montgomery v. Risen

That is Tina Bennett's position as well. Have a Happy New Year.

-----Original Message-----
From: Bruce Rosen [mailto:BRosen@marc-law.com]
Sent: Wednesday, December 30, 2015 2:14 PM
To: Handman, Laura <laurahandman@dwt.com>
Cc: Larry Klayman <leklayman@gmail.com>; Ratner, Micah <MicahRatner@dwt.com>; Brian.Toth@hklaw.com; Sandy.Bohrer@hklaw.com; Kevin Marino <kmarino@khmarino.com>; John Boyle <jboyle@khmarino.com>; Dina James (daj142182@gmail.com) (daj142182@gmail.com) <daj142182@gmail.com>
Subject: Re: Stipulation, Montgomery v. Risen

Pleased be advised that S&S will oppose any effort to publicly file the produced redacted documents.
Happy New Year to all

Sent from my iPhone. This email may contain privileged information. Please excuse any typos from this tiny keyboard.

On Dec 30, 2015, at 1:24 PM, Handman, Laura <laurahandman@dwt.com <mailto:laurahandman@dwt.com> > wrote:

    Larry:

        I have signed and attached a revised Stipulation. As reflected in the attached redline version, I have included at the end of the Stipulation "and were marked 'CONFIDENTIAL' pursuant to the Protective Order entered in this case (ECF No. 89)." Please execute the signed Stipulation and return to me and counsel copied on this email.

        As you have indicated below , you will file the Stipulation without the Exhibits in any public filing unless and until the confidential designation is removed either by Simon & Schuster, Priscilla Painton and Tina Bennett, whose counsel are copied on this email, or upon court order pursuant to the terms of the Protective Order.

    Laura

    Laura R. Handman | Davis Wright Tremaine LLP
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    Tel: (202) 973-4224 | Fax: (202) 973-4499
    and
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Email: laurahandman@dwt.com <mailto:laurahandman@dwt.com> | Website: www.dwt.com <http://www.dwt.com/>

Anchorage | Bellevue | Los Angeles | New York | Portland | San Francisco | Seattle | Shanghai | Washington, D.C.

From: Larry Klayman [mailto:leklayman@gmail.com]
Sent: Tuesday, December 29, 2015 9:09 PM
To: Handman, Laura
Cc: Ratner, Micah; Brian.Toth@hklaw.com <mailto:Brian.Toth@hklaw.com> ; <Sandy.Bohrer@hklaw.com <mailto:Sandy.Bohrer@hklaw.com> >; Dina James
Subject: Stipulation, Montgomery v. Risen

Dear Ms. Handman:

Please sign the stipulation attached and sent back by December 30, 2015. I will then sign it and send it back to you.

While the documents will be attached to the stipulation as Exhibits 1 and 2 for use during pre-trial and at trial, I will not electronically file the exhibits with the stipulation. Only the signed stipulation will be filed.

I trust, however, that the Simon & Schuster and Tina Bennett deponents will decide to withdraw the designation of the documents under protective order since there is nothing confidential about them.

Nevertheless, we can proceed as suggested above.

Sincerely,

Larry Klayman

<Signed Stipulation.pdf>

<Stipulation of Authenticity for Documents Produced by S&S, Painton, and Bennett.DOCX>

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