

Exhibit E



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Mr. Daryl Lapp
Locke Lord
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RE: John Doe v. Williams College

March 4, 2018

Dear Attorney Lapp:

I am writing this letter as a follow up to my email dated March 2, 2018.

As stated in that email, Ms. Camacho testified that she emailed my client after receiving the July 19, 2017 email (in WMS03639) regarding additional witnesses for "Susan Smith." I have not been provided any such email. Please have the College provide it. Ms. Camacho also testified, quite emphatically, that she had received the March 13, 2017 Cease and Desist Letter I had sent "Smith." There are no such communications that have been provided by the College. Please follow up with that.

Ms. Camacho also stated that it was she who provided Ms. Kurker with the College's policies for her report. Ms. Bossong mentioned that policies were sent to Ms. Kurker, to paraphrase her testimony. Therefore, Ms. Camacho was the individual who supplied the policies in the context of Ms. Bossong's mention that policies were sent to Ms. Kurker. The College's Answer to #20 in its Answers to Plaintiff's Fourth Set of Interrogatories fails to identify the Bates numbers of the documents produced by Defendant that comprise the policies that Ms. Bossong and now Ms. Camacho have stated were sent to Allyson Kurker. As extensively discussed and repeatedly requested in our Requests for Production and in email correspondence, we believe that these policies have been improperly not produced.

As far as the strangely made claim in the College's Answer to #20 and #22 in its Answers to Plaintiff's Fourth Set of Interrogatories that I sent "incorrect policies" to Ms. Kurker, this statement inaccurately represents the facts.

The day after the third and final interview with my client on July 13, 2016, I emailed Ms. Kurker two files directly downloaded from the College's website: the College's Code of Conduct Brochure effective October 2015 and the Sexual Misconduct Policies effective October 2014. At the first interview Ms. Kurker had with my client, she was only referring to a copy of the most recent policy that she said that she had just printed out shortly before commencing the interview. As Ms. Kurker had looked bewildered and seemed completely unfamiliar with the College's policies at the first interview, I was concerned that her report would not contain policies in effect at the times in question.

The file properties in the electronic documents indicate their authenticity. These were the only relevant policies available online other than the current policies for academic year 2015-2016. We had not yet learned that the College's most recent policies were comprised in a hard copy 2012-2013 Student Handbook.

The same argument applies to the College's Answer #22 which fails to identify email communication of the individual who emailed the policies in question to Ms. Kurker.

This issue has obviously been exhaustively discussed with no resolution. Therefore, the above documents referenced in the Interrogatories will be included in our Motion to Compel. As additional information keeps being introduced regarding documents the College has not produced, the Motion to Compel has been delayed so that the Motion can address all relevant material.

Yours sincerely,

ROSSI LAW FIRM



Stacey Elin Rossi, Esq.

cc. Ms. Krista A. Wroldson Miller
Ms. Elizabeth Kelly