

***Exhibit E***



privilege log, or no longer exist.

**REQUEST FOR PRODUCTION NO. 95:** Please produce all records / documents that formed the factual basis for the Memorandums of Record referred to in your Fourth Supplemental Privilege Log Entries 87-93.

**RESPONSE:** WTNY has no way of determining what specific records and/or documents formed the factual basis for the documents identified as Privilege Log Nos. 87-93. All documents related to the documents identified as Privilege Log Nos. 87-93 have either been produced, identified in the privilege log, or no longer exist.

**REQUEST FOR PRODUCTION NO. 96:** Please produce all records / documents that formed the factual basis for the Memorandums of Record SD000001, SD000002, and SD000003.

**RESPONSE:** WTNY has no way to determine what specific records and/or documents formed the factual basis for the documents bates stamped SD000001, SD000002, and SD000003. All documents that formed the factual basis for the documents bates stamped SD000001, SD000005, and SD000003 have either been produced, identified in the privilege log, or no longer exist.

**VERIFICATION**

Thomas Jefferson, Jr. states that he has read the foregoing (*Defendant WTNY's Responses to Plaintiffs' Sixth Set of Combined Discovery*) and knows the contents thereof; that said answers were prepared with the assistance and advice of counsel; that the answers set forth herein, subject to inadvertent or undisclosed errors, are necessarily limited by the records and information still in existence presently recollected and thus far discovered in the course of the preparation of all answers. Consequently, he reserves the right to make any changes to the answers if it appears at any time that omissions or errors have been made therein or that more accurate information is available; and that subject to the limitations set forth herein, the answers are true to the best of his knowledge, information and belief.

  
Thomas Jefferson, Jr.

Dated: 9/28/2023