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15 *Attorneys for Defendant Elon Musk*

16 **UNITED STATES DISTRICT COURT**  
17 **CENTRAL DISTRICT OF CALIFORNIA**

18 VERNON UNSWORTH,

19 Plaintiff,

20 vs.

21 ELON MUSK,

22 Defendant.

Case No. 2:18-cv-08048

Judge: Hon. Stephen V. Wilson

**DECLARATION OF MICHAEL T. LIFRAK IN SUPPORT OF DEFENDANT’S OPPOSITION TO PLAINTIFF’S MOTION TO COMPEL**

Complaint Filed: September 17, 2018

Trial Date: December 2, 2019

1           **I, Michael T. Lifrak, declare as follows:**

2           1.       I am a member of the bar of the State of California and a partner at  
3 Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Elon Musk. I  
4 make this declaration of personal, firsthand knowledge, and if called and sworn as a  
5 witness, I could and would testify competently thereto.

6           2.       I submit this declaration in support of Mr. Musk's Opposition to Vernon  
7 Unsworth's Motion to Compel.

8           3.       Mr. Unsworth's Motion to Compel initially included a request that Mr.  
9 Musk confirm that he has searched his iCloud account for responsive materials.  
10 Attached hereto as **Exhibit 1** is a true and correct copy of the declaration Alex  
11 Stillings regarding the search of Mr. Musk's iCloud account, that was provided to  
12 Mr. Unsworth on October 2, 2019, and has resolved this issue.

13           4.       Attached hereto as **Exhibit 2** is a true and correct copy of a meet and  
14 confer correspondence between my partner Alex Spiro, and counsel for Mr.  
15 Unsworth, dated September 26, 2019.

16           5.       Based on a reasonable search and diligent inquiry, all documents and  
17 communications in Mr. Musk's possession, custody, or control regarding James  
18 Howard's investigation have been produced. No attorney-client privilege or attorney  
19 work product privilege was claimed over these materials.

20           6.       Attached hereto as **Exhibit 3** is a true and correct copy of a document  
21 produced by Mr. Musk, as MUSK000361, on July 17, 2019.

22           7.       Attached hereto as **Exhibit 4** is a true and correct copy of a tweet posted  
23 by L. Lin Wood to Twitter on August 28, 2018, containing a demand letter to Mr.  
24 Musk.

25           8.       Attached hereto as **Exhibit 5** is a true and correct copy of an email I  
26 received from Mr. Unsworth's counsel, Taylor Wilson, on September 23, 2019,  
27 which provided access to an additional production of responsive materials by Mr.  
28 Unsworth.



# EXHIBIT 1

**ICLOUD SEARCH CERTIFICATION**

I, Alex Bradford Stillings, as a representative employed by SpaceX, as a IT Support Lead with expertise in macOS + iOS support, management, and repairs. I hereby certify as follows:

A. On October 1, 2019, I was provided access Elon Musk's computer, cell phones, and iCloud account that backs up and stores the contents of his devices.

B. For security purposes, Mr. Musk regularly changes his cellular device, at which time his old device is imaged, wiped clean, and stored or destroyed.

C. Upon checking Mr. Musk's accessible cell phones, I became aware that he has engaged the setting on the phones to sync his text messages via iCloud. This setting confirms that searches made on this phone would include his full text message history during the period of time requested.

D. I assisted Mr. Musk in searching the phones using the following search terms for documents or communications from the period July through September 2018:

- "Unsworth"
- pedo! or rapist or rape! or "child bride"
- "James Howard"
- "Jupiter" and investig! and Unsworth
- (PR or publicity or publish! or market! or press) and ("rescue submarine" or submarine or "rescue capsule" or capsule or "rescue tube" or "Thailand" or rescue)

E. Based on my review of the preserved data, there are no documents that respond to these terms.

Dated: 10/1/19

Signed by: Alex Stillings

~~Sworn to and subscribed before me,~~

~~This \_\_\_ day of \_\_\_\_\_, 2019.~~

~~\_\_\_\_\_~~

~~NOTARY PUBLIC~~

~~My commission expires: \_\_\_\_\_~~

*See attached*

**CALIFORNIA JURAT WITH AFFIANT STATEMENT**

**GOVERNMENT CODE § 8202**

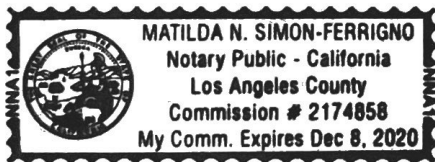
- See Attached Document (Notary to cross out lines 1-6 below)
- See Statement Below (Lines 1-6 to be completed only by document signer[s], *not* Notary)

<p>1 _____</p> <p>2 _____</p> <p>3 _____</p> <p>4 _____</p> <p>5 _____</p> <p>6 _____</p> <p>_____ Signature of Document Signer No. 1</p>	<p>_____ Signature of Document Signer No. 2 (if any)</p>
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A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California  
 County of Los Angeles

Subscribed and sworn to (or affirmed) before me  
 on this 1<sup>st</sup> day of October, 2019,  
 by Alex Bradford Stillings  
 (and (2) \_\_\_\_\_),



Name(s) of Signer(s)

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature \_\_\_\_\_  
 Signature of Notary Public

*Seal*  
Place Notary Seal Above

**OPTIONAL**

*Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.*

**Description of Attached Document**

Title or Type of Document: \_\_\_\_\_ Document Date: \_\_\_\_\_

Number of Pages: \_\_\_\_\_ Signer(s) Other Than Named Above: \_\_\_\_\_

# EXHIBIT 2



**Jeanine Zalduendo**

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**From:** Alex Spiro  
**Sent:** Thursday, September 26, 2019 12:40 PM  
**To:** Lin Wood  
**Cc:** Matt Wood; Nicole Wade; Jonathan Grunberg; Taylor Wilson; Chris Chatham; Mark Stephens, CBE; Adam Fellows; Alex Bergjans; Jeanine Zalduendo; Robert Schwartz; Michael Lifrak  
**Subject:** Re: Response to Musk MSJ

Lin,

I will respond to your questions and comments about the experts in due course but the recent production has created a pressing and significant issue.

On Monday September 23, 2019, your firm served its third supplemental production of documents, well after the discovery cutoff and long after we'd deposed your client. In the email serving the production, Taylor represented that "[w]ith the production of these documents, Plaintiff has completed his production and responded to each of Defendant's meet and confer requests." That is not true. You continue to withhold responsive documents. They should be produced immediately. Moreover, given that these holes continue to exist after you represented that the production is complete, we are concerned about the preservation, collection, and review process that Mr. Unsworth and your firm have undertaken in this case.

Perhaps most troubling and puzzling is the fact that despite the reality that it was your and Mr unsworth's decision to bring suit well over a year ago, no one bothered to collect responsive documents (or review them) at the outset.

**Mr. Unsworth Produced No Instant Messages Between Him and Tik**

Mr. Unsworth's partner, Tik, testified in deposition that she and Mr. Unsworth communicate on WhatsApp and Line. Yet, we have not received any chat logs or documents related to their communications on either application. In fact, Mr. Unsworth has only produced three emails between him and his partner, Tik. He has produced no other electronic communications between the two of them.

The absence of these chats from your production is concerning. As your production makes clear, Mr. Unsworth frequently uses these applications to chat with his friends and fellow rescue volunteers about the Thai Cave Rescue, opportunities arising from his role in the rescue, Mr. Musk, and this lawsuit. Mr. Unsworth has produced (belatedly) around 100 pages of chats between him and friends, and zero between him and his partner (even though we know they used them to communicate). Given the volume of responsive chats with other persons, Tik's testimony, and the fact that Mr. Unsworth and Tik live apart for a substantial portion of the year, Mr. Unsworth appears to be withholding responsive communications between him and Tik.

**Mr. Unsworth Produced 100 Pages of Key Documents Well After His Deposition and Eleven Days After the Discovery Cut-Off**

On Monday, you produced 100 pages of documents and communications, which should have been produced earlier and in advance of Mr. Unsworth's deposition. For instance, the production included text messages between Mr. Unsworth and his estranged wife Vanessa. We requested a complete production of these messages in our August 7, 2019 meet and confer letter and you agreed to produce them on our August 9, 2019 call. It is unclear why it took nearly one-and-a-half months to produce these documents. But as a result, we were unable to question either Mr. Unsworth or Vanessa about them at their depositions.

Also on Monday, you produced 81 pages of chat logs between Mr. Unsworth and Thanet Natisri. These chats contain probative information relating to Mr. Unsworth's reputation, credibility, and potential damages. The messages include numerous references to Mr. Musk and this lawsuit. They also identify financial opportunities Mr. Unsworth received after Mr. Musk's statements that are relevant to testing the purported harm to Mr. Unsworth's reputation. Again, there is no justification for your having withheld these relevant chats from Mr. Unsworth's earlier productions. They could and should have been collected and produced with the other chat logs Mr. Unsworth produced in August, before his deposition.

**Additional Missing Documents**

Your last production also identifies relevant documents and communications that you have not produced. Mr. Unsworth's chat log with Mr. Natisri shows that the two exchanged 632 photographs, 491 "stickers", 12 video files, and 37 files. This media cannot be viewed in the format for which you produced the chat log. Please produce all chats in a format that allows us to view all photographs, videos, sticker, and other files that Mr. Unsworth received and exchanged in all of these chats.

Mr. Unsworth's chats with Mr. Natisri also reference other responsive documents and communications that you have not produced. For instance, on November 13, 2018, Mr. Unsworth told Mr. Natisri that he retained an agent/representative, Will Robinson, to assist him negotiate film rights. However, Mr. Unsworth has produced only one communication involving his agent (an email with an author in which Mr. Robinson is copied) and no other documents relating to this relationship. According to the chats, more communications exist that you have not produced. See VU03370 ("You should see the email I've just received from Dr Harry and Dr Craig book writer. They NEED ME SO SO MUCH. Sent it on to my agent").

Mr. Unsworth also describes emails he received from agents and studios relating to his role in the Thai Cave Rescue. On November 13, 2018, Mr. Unsworth told Mr. Natisri that he had received an email from CAA. You have failed to produce that email. On November 15, 2018, Mr. Unsworth messaged Mr. Natisri that he sent him an email to put him in contact with Mr. Robinson. Again, you have failed to produce that email. Mr. Unsworth also claims in these chats that he has had a number of meetings and communications with representatives from Warner Brothers, but again, you have failed to produce any documents constituting or relating to these communications.

All of these referenced communications and documents are responsive to Mr. Musk's RFP No. 26 and should have been produced.

The absence of a significant number of responsive documents (including communications between Mr. Unsworth and Tik) from your purportedly "complete" production suggests either that key documents were deleted or never collected in the first place. We ask that, consistent with your obligations under the Federal Rules of Civil Procedure and your responses to Mr. Musk's document requests, all of these documents be produced promptly.

Please let us know by tomorrow evening, Friday September 27, 2019, if you will be producing these documents and by when.

Alex

Sent from my BlackBerry - the most secure mobile device

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**From:** lwood@linwoodlaw.com  
**Sent:** September 26, 2019 10:33 AM  
**To:** alexspiro@quinnemanuel.com  
**Cc:** mwood@wshllp.com; nwade@linwoodlaw.com; jgrunberg@linwoodlaw.com; twilson@linwoodlaw.com; chris@chathamfirm.com; Mark.Stephens@howardkennedy.com; Adam.Fellows@howardkennedy.com; alexbergjans@quinnemanuel.com; jeaninezalduendo@quinnemanuel.com; robertschwartz@quinnemanuel.com; michaellifrak@quinnemanuel.com  
**Subject:** Re: Response to Musk MSJ

Alex,

One more quick question - given the detailed expert reports provided to you by Mr. Unsworth's experts, how much time do you wish to block off for each deposition?

Thanks.

Lin

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Direct Dial: [\(404\) 891-1406](tel:(404)891-1406)  
Facsimile: [\(404\) 506-9111](tel:(404)506-9111)  
E-Mail: [lwood@linwoodlaw.com](mailto:lwood@linwoodlaw.com)

Sent from my iPhone

On Sep 26, 2019, at 10:33 AM, Lin Wood <[lwood@linwoodlaw.com](mailto:lwood@linwoodlaw.com)> wrote:

Alex,

I have not refused to make these witnesses available to you. You first made the request at 9:30 pm last night. Give me reasonable time to work through your request in order to respond. I hope to do so later today.

Plaintiff adhered to the scheduling order and the experts were timely identified. Any suggestion to the contrary is dead wrong.

Unlike Musk, my client has adhered to the letter and spirit of the Federal Rules relating to discovery.

As I speak with the experts in order to respond to your demand of last night, please confirm that Musk will be responsible for paying for any necessary travel expenses for the depositions incurred by the deponents. Please note that Mr. Jansen resides in Qatar.

Also, please confirm that Musk will pay these experts for their time spent preparing for the requested depositions, traveling to and from the depositions, and for the time spent being deposed.

Thanks.

Lin

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Direct Dial: [\(404\) 891-1406](tel:(404)891-1406)  
Facsimile: [\(404\) 506-9111](tel:(404)506-9111)  
E-Mail: [lwood@linwoodlaw.com](mailto:lwood@linwoodlaw.com)

Sent from my iPhone

On Sep 26, 2019, at 6:32 AM, Alex Spiro <[alexspiro@quinnemanuel.com](mailto:alexspiro@quinnemanuel.com)> wrote:

Lin,

As in most cases, you disclosed your experts at the close of fact discovery. That made it impossible for us to depose them earlier. The court expects you to make them available for deposition (and rule 26b4a requires it). We've asked you to check with them for the weeks of October 21 and 28. Let us know when they are available during that period.

We will let you know by the October 14 deadline whether we intend to call experts. Of course we will cooperate with a request to depose them.

I want to be clear. We remain willing to allow you the extension of time to oppose our summary judgment motion (as always so long as it doesn't throw off the whole schedule). I was merely questioning whether it was really necessary given the various timing issues which is neither of our faults. Our request that you present it to the Court in the form of an unopposed request is driven by our desire to not convey to the Court that we, as opposed to plaintiff, are asking to encroach into the 14-day period the local rule requires for review of the briefs.

Thx

Alex

Sent from my BlackBerry - the most secure mobile device

---

**From:** [lwood@linwoodlaw.com](mailto:lwood@linwoodlaw.com)  
**Sent:** September 25, 2019 11:01 PM  
**To:** [alexspiro@quinnemanuel.com](mailto:alexspiro@quinnemanuel.com)  
**Cc:** [mwood@wshllp.com](mailto:mwood@wshllp.com); [nwade@linwoodlaw.com](mailto:nwade@linwoodlaw.com); [jgrunberg@linwoodlaw.com](mailto:jgrunberg@linwoodlaw.com); [twilson@linwoodlaw.com](mailto:twilson@linwoodlaw.com); [chris@chathamfirm.com](mailto:chris@chathamfirm.com); [Mark.Stephens@howardkennedy.com](mailto:Mark.Stephens@howardkennedy.com); [Adam.Fellows@howardkennedy.com](mailto:Adam.Fellows@howardkennedy.com); [alexbergjans@quinnemanuel.com](mailto:alexbergjans@quinnemanuel.com); [jeaninezaldueendo@quinnemanuel.com](mailto:jeaninezaldueendo@quinnemanuel.com); [robertschwartz@quinnemanuel.com](mailto:robertschwartz@quinnemanuel.com); [michaellifrak@quinnemanuel.com](mailto:michaellifrak@quinnemanuel.com)  
**Subject:** Re: Response to Musk MSJ

Alex,

I will provide a more fulsome response to you tomorrow. Suffice it for tonight to say that we will certainly accept subpoenas for dates we agree on with respect to any witness.

Does Musk plan to identify experts? If so, am I correct that you will cooperate with requests for their depositions? You had earlier suggested you did not think you would be identifying experts but I could be mistaken on that point or you may have changed your mind.

I wish this expert issue had been addressed before we did the consent stipulation. The order is somewhat inflexible on additional depositions beyond the discovery date. But I will be the first to say that the scheduling order has been a bit of a scheduling fiasco. I thought my request today for a 3 day extension of time by consent was entirely reasonable and fair yet you insist on putting me to the task of

filing a motion and getting a ruling because of the strict language of the Court's rule and order.

I will continue to work with you in good faith on scheduling issues provided the road goes in two directions going forward.

Thanks.

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E-Mail: [lwood@linwoodlaw.com](mailto:lwood@linwoodlaw.com)

Sent from my iPhone

On Sep 25, 2019, at 9:36 PM, Alex Spiro <[alexspiro@quinnemanuel.com](mailto:alexspiro@quinnemanuel.com)> wrote:

Lin-

In terms of the msj schedule, we are not comfortable changing the requirement in the Local Rules that the judge have 14 days between the filing of our reply and the hearing. It cuts into the judge's time to consider our motion. We are also are not willing to cut into our own time to respond or to change the hearing date. I think given that reality we should just leave it and not bother the court but if you file a motion to push the due dates on the opposition and reply by three days, we would not oppose so long as the above is understood. We just can't stipulate to it bc of the issues above.

In terms of experts, please provide available dates for the depositions of Mr. Rose and Mr. Jansen, particularly the weeks of October 21 and October 28. Please also confirm that you will accept service of document subpoenas for these witnesses.

Thx

Alex

Sent from my BlackBerry - the most secure mobile device

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**From:** [lwood@linwoodlaw.com](mailto:lwood@linwoodlaw.com)  
**Sent:** September 25, 2019 2:36 PM  
**To:** [alexspiro@quinnemanuel.com](mailto:alexspiro@quinnemanuel.com)  
**Cc:** [mwood@wshllp.com](mailto:mwood@wshllp.com); [nwade@linwoodlaw.com](mailto:nwade@linwoodlaw.com); [jgrunberg@linwoodlaw.com](mailto:jgrunberg@linwoodlaw.com); [twilson@linwoodlaw.com](mailto:twilson@linwoodlaw.com); [chris@chathamfirm.com](mailto:chris@chathamfirm.com); [Mark.Stephens@howardkennedy.com](mailto:Mark.Stephens@howardkennedy.com); [Adam.Fellows@howardkennedy.com](mailto:Adam.Fellows@howardkennedy.com);

[alexbergjans@quinnemanuel.com](mailto:alexbergjans@quinnemanuel.com); [jeaninezaldueendo@quinnemanuel.com](mailto:jeaninezaldueendo@quinnemanuel.com); [robertschwartz@quinnemanuel.com](mailto:robertschwartz@quinnemanuel.com); [michaellifrak@quinnemanuel.com](mailto:michaellifrak@quinnemanuel.com)

**Subject:** Re: Response to Musk MSJ

I may be overly optimistic but I think the Court would be willing to cut us a couple days slack on the 14 day requirement if we present him with a consent order on the dates. Let me know if it works for you and your team to present such a consent order. Then the Court will do what he wants with it. He will sign it or refuse to sign it. The consent order can include a reference to the fact that the hearing is presently set for October 28. Thanks.

L. Lin Wood  
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Direct Dial: [\(404\) 891-1406](tel:(404)891-1406)  
Facsimile: [\(404\) 506-9111](tel:(404)506-9111)  
E-Mail: [lwood@linwoodlaw.com](mailto:lwood@linwoodlaw.com)

Sent from my iPhone

On Sep 25, 2019, at 2:32 PM, Alex Spiro  
<[alexspiro@quinnemanuel.com](mailto:alexspiro@quinnemanuel.com)> wrote:

Let me chat the team and circle back. Your proposal makes sense if it didn't back into the 14 day rule but I'll get back to you asap

Sent from my BlackBerry - the most secure mobile device

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**From:** [lwood@linwoodlaw.com](mailto:lwood@linwoodlaw.com)  
**Sent:** September 25, 2019 2:25 PM  
**To:** [alexspiro@quinnemanuel.com](mailto:alexspiro@quinnemanuel.com)  
**Cc:** [mwood@wshlp.com](mailto:mwood@wshlp.com); [nwade@linwoodlaw.com](mailto:nwade@linwoodlaw.com); [jgrunberg@linwoodlaw.com](mailto:jgrunberg@linwoodlaw.com); [twilson@linwoodlaw.com](mailto:twilson@linwoodlaw.com); [chris@chathamfirm.com](mailto:chris@chathamfirm.com); [Mark.Stephens@howardkennedy.com](mailto:Mark.Stephens@howardkennedy.com); [Adam.Fellows@howardkennedy.com](mailto:Adam.Fellows@howardkennedy.com); [alexbergjans@quinnemanuel.com](mailto:alexbergjans@quinnemanuel.com); [jeaninezaldueendo@quinnemanuel.com](mailto:jeaninezaldueendo@quinnemanuel.com); [robertschwartz@quinnemanuel.com](mailto:robertschwartz@quinnemanuel.com); [michaellifrak@quinnemanuel.com](mailto:michaellifrak@quinnemanuel.com)  
**Subject:** Re: Response to Musk MSJ

Don't you think that since you have a weekend for your reply to what we file on the 7th that you will not really need any additional time for the reply? If not, I am fine with you adding reply by the 17th and us submitting a consent order to the Judge with those dates. He will either sign it or he will not. If not, we are stuck with the present dates. Is he signs it, we both have the same extra time.

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Facsimile: [\(404\) 506-9111](tel:(404)506-9111)  
E-Mail: [lwood@linwoodlaw.com](mailto:lwood@linwoodlaw.com)

Sent from my iPhone

On Sep 25, 2019, at 2:22 PM, Alex Spiro  
<[alexspiro@quinnemanuel.com](mailto:alexspiro@quinnemanuel.com)> wrote:

The 14th. So I'm genuinely trying to be helpful to your team but I'm boxed in a bit

Sent from my BlackBerry - the most secure mobile device

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**From:** [lwood@linwoodlaw.com](mailto:lwood@linwoodlaw.com)  
**Sent:** September 25, 2019 2:14 PM  
**To:** [alexspiro@quinnemanuel.com](mailto:alexspiro@quinnemanuel.com)  
**Cc:** [mwood@wshllp.com](mailto:mwood@wshllp.com); [nwade@linwoodlaw.com](mailto:nwade@linwoodlaw.com); [jgrunberg@linwoodlaw.com](mailto:jgrunberg@linwoodlaw.com); [twilson@chathamfirm.com](mailto:twilson@chathamfirm.com); [Mark.Stephens@howardkennedy.com](mailto:Mark.Stephens@howardkennedy.com); [Adam.Fellows@howardkennedy.com](mailto:Adam.Fellows@howardkennedy.com); [alexbergjans@quinnemanuel.com](mailto:alexbergjans@quinnemanuel.com); [jeaninezaldueendo@quinnemanuel.com](mailto:jeaninezaldueendo@quinnemanuel.com); [robertschwartz@quinnemanuel.com](mailto:robertschwartz@quinnemanuel.com); [michaellifrak@quinnemanuel.com](mailto:michaellifrak@quinnemanuel.com)  
**Subject:** Re: Response to Musk MSJ

Remind me - what is your present reply date?

L. Lin Wood  
L. LIN WOOD, P.C.  
1180 West Peachtree Street  
Suite 2040  
Atlanta, GA 30309  
Telephone: [\(404\) 891-1402](tel:(404)891-1402)  
Direct Dial: [\(404\) 891-1406](tel:(404)891-1406)  
Facsimile: [\(404\) 506-9111](tel:(404)506-9111)  
E-Mail: [lwood@linwoodlaw.com](mailto:lwood@linwoodlaw.com)

Sent from my iPhone

On Sep 25, 2019, at 2:11 PM, Alex Spiro  
<[alexspiro@quinnemanuel.com](mailto:alexspiro@quinnemanuel.com)>  
wrote:



The other problem because of Wilson's rules is if we give you an extension then we have less time. We can't work in an extension

Sent from my BlackBerry - the most secure mobile device

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**From:** [alexspiro@quinnemanuel.com](mailto:alexspiro@quinnemanuel.com)  
**Sent:** September 25, 2019 1:57 PM  
**To:** [lwood@linwoodlaw.com](mailto:lwood@linwoodlaw.com)  
**Cc:** [mwood@wshllp.com](mailto:mwood@wshllp.com); [nwade@linwoodlaw.com](mailto:nwade@linwoodlaw.com); [jgrunberg@linwoodlaw.com](mailto:jgrunberg@linwoodlaw.com); [chris@chathamfirm.com](mailto:chris@chathamfirm.com); [Mark.Stephens@howardkennedy.com](mailto:Mark.Stephens@howardkennedy.com); [Adam.Fellows@halexbergjans@quinnemanuel.com](mailto:Adam.Fellows@halexbergjans@quinnemanuel.com); [jeaninezaldueendo@quinnemanuel.com](mailto:jeaninezaldueendo@quinnemanuel.com); [robertmichaellifrak@quinnemanuel.com](mailto:robertmichaellifrak@quinnemanuel.com)  
**Subject:** Re: Response to Musk MSJ

Let me check and also check on our filing on Columbus day and get back to you

Sent from my BlackBerry - the most secure mobile device

---

**From:** [lwood@linwoodlaw.com](mailto:lwood@linwoodlaw.com)  
**Sent:** September 25, 2019 1:55 PM  
**To:** [alexspiro@quinnemanuel.com](mailto:alexspiro@quinnemanuel.com)  
**Cc:** [mwood@wshllp.com](mailto:mwood@wshllp.com); [nwade@linwoodlaw.com](mailto:nwade@linwoodlaw.com); [jgrunberg@linwoodlaw.com](mailto:jgrunberg@linwoodlaw.com); [chris@chathamfirm.com](mailto:chris@chathamfirm.com); [Mark.Stephens@howardkennedy.com](mailto:Mark.Stephens@howardkennedy.com); [Adam.Fellows@halexbergjans@quinnemanuel.com](mailto:Adam.Fellows@halexbergjans@quinnemanuel.com); [jeaninezaldueendo@quinnemanuel.com](mailto:jeaninezaldueendo@quinnemanuel.com); [robertmichaellifrak@quinnemanuel.com](mailto:robertmichaellifrak@quinnemanuel.com)  
**Subject:** RE: Response to Musk MSJ

[EXTERNAL EMAIL]

---

Alex,

Understood. We will file our response on or before October 7 and you will file your reply on or before October 14.

Given our agreement, do you think we are required to submit a consent order to Judge Wilson or can we simply proceed in reliance on our agreement as to those dates?

Looks like we both may possibly need to supplement after the depositions of Glover, the resolution of Mac's deposition and any ruling on our proposed discovery dispute stipulation (which I hope to send to you today or in the morning). But we can discuss and cross those bridges down the road if and when necessary, don't you think?

Thanks.

Lin

L. Lin Wood

L. LIN WOOD, P.C.

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Atlanta, GA 30309

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com](mailto:lwood@linwoodlaw.com)

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**From:** Alex Spiro  
<[alexspiro@quinnemanuel.com](mailto:alexspiro@quinnemanuel.com)>

**Sent:** Wednesday,  
September 25, 2019  
1:38 PM

**To:** Lin Wood  
<[lwood@linwoodlaw.com](mailto:lwood@linwoodlaw.com)>

**Cc:** Matt Wood  
<[mwood@wshllp.com](mailto:mwood@wshllp.com)>; Nicole Wade  
<[nwade@linwoodlaw.com](mailto:nwade@linwoodlaw.com)>; Jonathan  
Grunberg  
<[jgrunberg@linwoodlaw.com](mailto:jgrunberg@linwoodlaw.com)>; Taylor  
Wilson

<[twilson@linwoodlaw.com](mailto:twilson@linwoodlaw.com)>; Chris  
Chatham  
<[chris@chathamfirm.com](mailto:chris@chathamfirm.com)>; Mark

Stephens, CBE  
<[Mark.Stephens@wardkennedy.com](mailto:Mark.Stephens@wardkennedy.com)>;

Adam Fellows  
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Robert Schwartz  
<[robertschwartz@quinnemanuel.com](mailto:robertschwartz@quinnemanuel.com)>;

Michael Lifrak  
<[michaellifrak@quinnemanuel.com](mailto:michaellifrak@quinnemanuel.com)>

**Subject:** Re:  
Response to Musk  
MSJ

We can use our  
office. I have my own  
personal ice machine  
just so you know.

What about Oct 7,  
and we respond on  
14. Gives you the  
weekend. Under  
Wilson rules we have  
to file by 14 bc he  
requires 2 wks before  
hearing.

Sent from my  
BlackBerry - the most  
secure mobile device

---

**From:** [lwood@linwoodlaw.com](mailto:lwood@linwoodlaw.com)

**Sent:** September 25, 2019 1:27 PM

**To:** [alexspiro@quinnemanuel.com](mailto:alexspiro@quinnemanuel.com)

**Cc:** [mwood@wshllp.com](mailto:mwood@wshllp.com); [nwade@linwoodlaw.com](mailto:nwade@linwoodlaw.com); [jgrunberg@linwoodlaw.com](mailto:jgrunberg@linwoodlaw.com); [chris@chathamfirm.com](mailto:chris@chathamfirm.com); [Mark.Stephens@howardkennedy.com](mailto:Mark.Stephens@howardkennedy.com); [Adam.Fellows@linwoodlaw.com](mailto:Adam.Fellows@linwoodlaw.com); [alexbergjans@quinnemanuel.com](mailto:alexbergjans@quinnemanuel.com); [jeaninezaldueendo@quinnemanuel.com](mailto:jeaninezaldueendo@quinnemanuel.com); [robert@michaelifrak@quinnemanuel.com](mailto:robert@michaelifrak@quinnemanuel.com)

**Subject:** RE: Response to Musk MSJ

[EXTERNAL EMAIL]

---

Thanks, Alex. I will  
look to hear from  
you on the extension  
request.

October 8 in NYC  
works for me for Ms.  
Glover's depo. We  
can pin down  
location well in  
advance of that date.

Do you have any suggestions? Your law office would be fine with me.

Lin

L. Lin Wood

L. LIN WOOD, P.C.

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---

**From:** Alex Spiro  
<[alexspiro@quinnemanuel.com](mailto:alexspiro@quinnemanuel.com)>  
**Sent:** Wednesday, September 25, 2019 1:23 PM  
**To:** Lin Wood  
<[lwood@linwoodlaw.com](mailto:lwood@linwoodlaw.com)>  
**Cc:** Matt Wood  
<[mwood@wshllp.com](mailto:mwood@wshllp.com)>; Nicole Wade  
<[nwade@linwoodlaw.com](mailto:nwade@linwoodlaw.com)>; Jonathan Grunberg  
<[jgrunberg@linwoodlaw.com](mailto:jgrunberg@linwoodlaw.com)>; Taylor Wilson  
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<[Mark.Stephens@howardkennedy.com](mailto:Mark.Stephens@howardkennedy.com)>; Adam Fellows  
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<[alexbergjans@quinnemanuel.com](mailto:alexbergjans@quinnemanuel.com)>

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Robert Schwartz  
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Michael Lifrak  
<[michaellifrak@quinnemanuel.com](mailto:michaellifrak@quinnemanuel.com)>  
**Subject:** Re:  
Response to Musk  
MSJ

Lin- an extension  
shouldn't be a  
problem let us just  
check judge Wilson  
rules and let me  
confer w my team.

Also- I heard back  
from Ms Glover who  
informed me she is in  
NY on Oct 8.  
Obviously I'm fine to  
do it in NY but  
wanted to check

Sent from my  
BlackBerry - the most  
secure mobile device

---

**From:** [lwood@linwoodlaw.com](mailto:lwood@linwoodlaw.com)

**Sent:** September 25, 2019 1:08 PM

**To:** [alexspiro@quinnemanuel.com](mailto:alexspiro@quinnemanuel.com)

**Cc:** [mwood@wshllp.com](mailto:mwood@wshllp.com); [nwade@linwoodlaw.com](mailto:nwade@linwoodlaw.com); [jgrunberg@linwoodlaw.com](mailto:jgrunberg@linwoodlaw.com); [chris@chathamfirm.com](mailto:chris@chathamfirm.com); [Mark.Stephens@howardkennedy.com](mailto:Mark.Stephens@howardkennedy.com); [Adam.Fellows@linwoodlaw.com](mailto:Adam.Fellows@linwoodlaw.com); [alexbergjans@quinnemanuel.com](mailto:alexbergjans@quinnemanuel.com); [jeaninezalduendo@quinnemanuel.com](mailto:jeaninezalduendo@quinnemanuel.com); [robertmichaellifrak@quinnemanuel.com](mailto:robertmichaellifrak@quinnemanuel.com)

**Subject:** RE: Response to Musk MSJ



[EXTERNAL EMAIL]

---

Alex,

My turn to admit hitting the send button inadvertently. Sorry.

Will you agree to a consent order being submitted to Judge Wilson that extends Mr. Unsworth's response date by one week, i.e., to October 11? We will certainly agree to any extension you request as to your reply due date and can include that in the consent order if you wish. The depositions next week have simply put us in a time crunch to meet the present October 4 deadline.

Can you let me know today if that is agreeable?

Thank you,

Lin

L. Lin Wood

L. LIN WOOD, P.C.

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---

**From:** Lin Wood  
**Sent:** Wednesday,  
September 25, 2019  
12:57 PM  
**To:** Alex Spiro  
<[alexspiro@quinnemanuel.com](mailto:alexspiro@quinnemanuel.com)>  
**Cc:** Matt Wood  
<[mwood@wshllp.com](mailto:mwood@wshllp.com)>; Nicole Wade  
<[nwade@linwoodlaw.com](mailto:nwade@linwoodlaw.com)>; Jonathan  
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Stephens, CBE  
<[Mark.Stephens@wardkennedy.com](mailto:Mark.Stephens@wardkennedy.com)>;  
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Robert Schwartz  
<[robertschwartz@quinnemanuel.com](mailto:robertschwartz@quinnemanuel.com)>;

#2278

Michael Lifrak  
<[michaellifrak@quin-nemanuel.com](mailto:michaellifrak@quin-nemanuel.com)>

**Subject:** Response to  
Musk MSJ

Alex,

Would you agree to  
a consent order to

L. Lin Wood

L. LIN WOOD, P.C.

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Peachtree Street

Suite 2040

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E-Mail:  
[lwood@linwoodlaw.  
com](mailto:lwood@linwoodlaw.com)

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error, please do  
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retransmit,  
disseminate, or  
otherwise use the  
information. Also,  
please indicate to  
the sender that you  
have received this  
communication in  
error, and delete  
the copy you  
received. Thank  
you.**

# **EXHIBIT 3**

From: James Brickhouse  
Sent: Tue 9/18/2018 4:39 PM (GMT-07:00)  
To: "Jupiter Private" <info@jupiter-private.com>  
Cc:  
Bcc:  
Subject: Re: Project Rowena Update

You mentioned several days ago that you would be sitting down with your embassy contact to get documented proof of Unsworth's travel over those 6 years that you indicated he spent time in Pattaya. Did that happen? That is an important piece of verification.

On Tue, Sep 18, 2018 at 4:16 AM Jupiter Private <[info@jupiter-private.com](mailto:info@jupiter-private.com)> wrote:  
Jim, this is the info as it came to me from the female lead from our team who befriended the sister and mother. Obviously we now know the DOB was incorrect. They related to the investigator that he first visited Thailand 29 yrs ago which would have been 1989. I have asked Steve to look at the Uk embassy records to verify.

1. When did he first move to Thailand?

= He first moved to Thailand about 7 years ago. (He first visited Thailand 29 years ago for his cave exploration project in the Southern of Thailand)

2. Do we know if he was visiting in the years before he moved to Thailand?

= Before he met Kun Tik. He sometimes traveled to Thailand for cave exploration and came with his cave explorers.

3. Why did he chose Chiang Rai, or was he based somewhere else previously – Pattaya etc?

= The reasons that he has chosen to live in Chiang Rai, because he loves studying about caves. Chianf Rai has plenty of interesting caves, especially Tam Luang. He believes that he still can explore more about this cave. Secondly, Kun Tik., it is her hometown and also she has land and house here. Tik has to take care of her family i.e. her Father, Mother and daughter (with her ex-husband) and she has a job here. So that it'd be a good reason for Vernon to live for his retirement here.

4. We understand he may have a coffee shop in Chiang Rai – is this his source of income?

= He opened a small coffee shop in 2016, named "Cha-Pa-Yom" which it is located in Mae Fha Luang district. It was a small coffee stand. It was not his source income.

5. If he has the coffee shop, is it successful and what do his competitors think?

= In the past he used to open this small coffee shop, there were a whole lot customers. So he didn't have competitors.

6. Where does he live and what lifestyle does he lead – expensive house/condo?

= For some period of time, they would come to stay with Tik's parents house. Her mother's house is also a small grocery shop. It has been on business since 2011. "Wan dee" is the name of the shop, which located in [REDACTED] Huai Krai sup-district, Maesai district, Chiang Rai Province. It's a one floor house and it is belong to her family.

7. Is he actually married to Khun Voranan?

= They have not made the marriage registration but they had a wedding ceremony according to Tik's family traditional.

8. When did they meet and how did they meet?

= They both met each other in England 8 years ago. Tik had a summer vacation and visited her friends there. A friend of her introduced Tik to Vernon. That was the beginning of their relationship.

Additional information;

1. Miss Woranan Ratrawiphukkun

- Her previous name was Suvimon Chomkeaw
- born on [REDACTED]
- Age 30
- Phone number [REDACTED]
- She used a car brand MG. Light blue color, plate no. [REDACTED]
- She's been working as a Secretary of Chief Executive of the SAO at Huai Krai SOA for 7 years.
- She worked in a chemical company in Bangkok.
- She quit the job in Bangkok then moved back to her hometown, in order to open the grocery shop. Her mother's now running the shop.
- She was married with a Thai person. She has a daughter/ 13-14 years old. The reason that she divorced was her ex-husband had another lover.
- Tik has one younger sister. Her sister is married and moved to another province.
- She graduated in Bachelor degree in Chaing Mai Rajabhat University, in management major.
- She has her business, is manicures salon "Elegant nails & Beauty Spa". There are 2 branches

1st Branch is located in front of Mae Fah Luang University

Address: [REDACTED], Tha-Sud sub-district, Mae Fah Luang district, Chiang Rai province.

2nd Branch

Address: [REDACTED] Nang-Le sub-district, Mae Fah Luang district, Chiang Rai province.

Open from 10.00 to 21.00 Hrs.

- Her business is running well, there are a lot of customers. Because there is not much competition. And it is her main income.

- She has open her business since 2013. The rentals cost 8,000 baht/p month

- He is fascinated in cave exploration all over the world and he has been doing it for over 40 years. He usually went with his team. He is planning about investing a tour business in Chiang Rai.



-They also have another business is importing digital Coffee Tamper. Since 2016 Name: "Eazytamp Thai" it sells throughout the nation. They has opened this business since 2016, they're both visiting many coffee shops.

- They recently bought a piece of land, which is close to Tik's mother house about 2 km. they are planing to build a house as well as a small resort there. Now it is a rice field.

- Vernon has a cave exploration project again in Tam-Huang soon. As the same time, he will also explore a cave in Naan province with his team.

- Vernon has left Thailand on the 18th July 2018 to England, then he will return on the 5 Sep 18 at the Suvarnabhumi Airport, Bangkok. His arrival at 3pm and Tik will fly to meet him at 4pm the airport.

- They both will attend to the thanking party at 6pm-21pm the Dusit Palace, Bangkok. The party was held by the Thai Government.

- Vernon stays in Thailand by a Tourist Visa from the beginning. He sometimes extended his visa by crossing the border in Maesai district, sometime he went to Vientiane. The Thai Government will renew a type of visa for him for a long term stay.

- He will stay in Thailand about 1 or 2 months then he will return to England.

- Vernon was marred to an English lady and they have one son.

- Vernon is older than Tik for 23 years, they started dating in late 2009

Kind regards,  
James

CEO - Qatar & UAE  
Jupiter Military & Tactical Systems  
Al Saad – Area 38  
Street No. 893, Building No. 7  
P.O. Box 22509 Doha  
State of Qatar  
[+44 \(0\) 7917 401601](tel:+44207917401601)

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On 17 Sep 2018, at 23:49, James Brickhouse <[jbrickhouse11@gmail.com](mailto:jbrickhouse11@gmail.com)> wrote:

I'm available whenever you are.

Also, what was the information source that suggested Unsworth has been going to Thailand since the 80's?

On Mon, Sep 17, 2018 at 10:59 AM Jupiter Private <[info@jupiter-private.com](mailto:info@jupiter-private.com)> wrote:  
Jim, I'm still here in Thailand and I am have not diverted my efforts away from the task or I would have informed you. I have been working hard with my Thai team as we last discussed. The time zones don't make it easy to communicate and as I had not heard from you I had presumed you where away with the principle. Disappointed you would think me so ready to abandon my post.

I am on route back to Chiang Mai tomorrow and suggest we communicate at 1700 GMT for a de-brief.

Kind regards,  
James

CEO - Qatar & UAE  
Jupiter Military & Tactical Systems  
Al Saad – Area 38  
Street No. 893, Building No. 7  
P.O. Box 22509 Doha  
State of Qatar  
[+44 \(0\) 7917 401601](tel:+4407917401601)  
[info@jupiter-private.com](mailto:info@jupiter-private.com)  
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On 17 Sep 2018, at 18:50, James Brickhouse <[jbrickhouse11@gmail.com](mailto:jbrickhouse11@gmail.com)> wrote:

James,

It appears you have decided to focus on other efforts that don't include the Rowenta related work. Your last email was 5 days ago and it contained nothing relevant to this project. Only a reference to your efforts to getting the birth record, which I obtained on my own accord. If you have decided to focus elsewhere, that is fine, but I will expect funds to be returned.

Thank you.

On Fri, Sep 14, 2018 at 10:29 AM Jupiter Private <[info@jupiter-private.com](mailto:info@jupiter-private.com)> wrote:  
Jim in transit I'll call when I am free a little later.

Kind regards,  
James

CEO - Qatar & UAE  
Jupiter Military & Tactical Systems  
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P.O. Box 22509 Doha  
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[+44 \(0\) 7917 401601](tel:+4407917401601)  
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On 14 Sep 2018, at 18:19, James Brickhouse <[jbrickhouse11@gmail.com](mailto:jbrickhouse11@gmail.com)> wrote:

Any news?

On Wed, Sep 12, 2018 at 7:49 AM Jupiter Military & Tactical Systems <[info@jupiter-private.com](mailto:info@jupiter-private.com)> wrote:

Jim,

Yes Ive been on the ground these past five days. I apologise for the lack of comms, my UK cell reception is not great and I have been in transit between Chiang Rai, Bangkok and Pattaya.

Unsworth was not a liked man on the ground during the dive rescue. A number of the Dive centres in Pattaya have divers that assisted with logistics in the rescue and have mentioned to me over a few beer that Unsworth was difficult and that he's attracted negative press to the rescue efforts. Everyone knows that his comments where initially inflammatory and that it was his initial outburst that riled the principle. When asked if they thought or knew anything about Unsworth's past they all said that they had no proof and had not heard anything specific. Just that he is not an easy man to like.

The update is that I am waiting this evening to meet with the Thai investigator and see if she has been able to secure a copy of the birth certificate that verifies the partner details one way or another. The dust has settled and its allot easier to move around the hotels and bars of Pattaya asking if they know Unsworth etc. I have met with one hotel owner and the records for the hotels which are a simple check in book are held by the previous hotel owner for the dates that interest us. I am meeting with him tomorrow as he is now retired but on the phone he has confirmed that he does have the old hotel registration books and will allow me to copy them. I will be staying in Thailand until we have exhausted all avenues and have completed the task.

Update on Unsworth is that he is returning to the UK next week and has confirmed meetings with his legal team Howard Kennedy on Tuesday and Wednesday.

I will keep you updated when I have further information.

Kind regards,  
James

CEO - Qatar & UAE  
Jupiter Military & Tactical Systems  
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Street No. 893, Building No. 7  
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On 12 Sep 2018, at 04:33, James Brickhouse <[jbrickhouse11@gmail.com](mailto:jbrickhouse11@gmail.com)> wrote:

Also, I can help but think that after his random and unprovoked initial attack on our principle, he has made enemies. They will likely know his dirt.

On Tue, Sep 11, 2018 at 7:52 PM James Brickhouse <[jbrickhouse11@gmail.com](mailto:jbrickhouse11@gmail.com)> wrote:

James,

I didn't hear from you today. I suppose you've made it to Thailand by now? I look forward to an update. Clearly we'd like to gather as much relevant information as possible, but we of course need to ensure it is done carefully and legally. Has there been any progress in Pattaya?

On Fri, Sep 7, 2018 at 2:21 AM Jupiter Military & Tactical Systems <[info@jupiter-private.com](mailto:info@jupiter-private.com)> wrote:

Jim,

Let me clear up the marriage issue. All the papers after the first Twitter fall out in the UK reported that Unsworth was married. It was not until the investigation team spoke to her sister that we learnt that they have had a wedding but, they did not complete the necessary registration with the local authorities. They regards themselves as a husband and wife, this however is not legal in Thailand. If her age is 30 then they met when she was 18/19. If she is in fact she is 40 then its they met when she was 28/29. The lead Thai investigator has arrived in Chiang Rai this morning to go to the town hall to obtain a copy of the birth certificate so we have proof you requested.

What I am doing now is reviewing all the evidence as its collected and then verifying this myself. I am also flying to Bangkok tomorrow morning to take charge of the investigation in Pattaya. I feel now that this is where the results will be found if they exists and I want to control the flow of information.

I will report further developments later today.

Kind regards,  
James Howard

CEO - Qatar & UAE  
Jupiter Military & Tactical Systems  
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Street No. 893, Building No. 7  
P.O. Box 22509 Doha  
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On 6 Sep 2018, at 20:00, James Brickhouse <[jbrickhouse11@gmail.com](mailto:jbrickhouse11@gmail.com)> wrote:

Please assure your source that we will not expose him or his information. Please understand that as of this moment much of what you have told us can't be verified. Our request for actual documentation is to confirm that we are being given legitimate information. The info that you said was leaked to the press wasn't actually leaked to the press. It was an off the record comment (which disgracefully was not respected as such and instead published) meant to encourage the journalist to actually do some due diligence rather than simply make assumptions. It doesn't seem too difficult to get something verifying her age, a document confirming travel records or a copy of a newspaper article. These things are vital simply for us to know that we are getting legitimate information.

Regarding your follow up comment, we were told numerous times that they were 'married' (or formed a relationship) in her late teens (you said 18), but that she was quoted in a newspaper saying they met 7 years prior. Does a copy of that article exist? Can you send it along? It appears this narrative has changed, or information was relayed based on broad assumption and that's what has us asking for legit verification. Because based on that original narrative she would have actually been a child/young teenager when they first met.

With that said, let's focus on what we can do now to be productive, move toward the objective and verify some of the key data. Do you have a definitive way to confirm her age? Have the guys found anything new in Pattaya?

On Thu, Sep 6, 2018 at 10:14 AM Jupiter Military & Tactical Systems <[info@jupiter-private.com](mailto:info@jupiter-private.com)> wrote:

Jim,

Just to clarify the points you made. The investigation team in Chiang Rai was able to establish a number of important information. I made the assumption based on what was reported back to me that if her age is in-fact 30 and not 40 and that she has been married (not legally) but in a religious context for 7 years plus we also know that she was dating Unsworth for at least a further 3 years prior to this then she would have been in her late teenage years when they met. I believe I told you that I thought this would have been about 19. There is a big difference between 19 and 29 I agree, and an even bigger leap to being a child rapist. I do not know how anyone could come to that conclusion as neither of us have ever mentioned children or rape in our conversations.

Today is the Thai Governments big celebration with over 60,000 expected in Bangkok. Our source at the Embassy is naturally extremely concerned about his information being used by the 3rd parties in further exchanges with the media. What assurances can I give him? You require evidence that can be used by the foreign press to show Unsworth was a regular visitor to Pattaya which is a well known haunt for sex tourists. Yes, the team are in Pattaya and developing the best strategy to qualify the information we have and then hopefully finding someone who knows unsworth and will give a statement.

The UK Embassy will be back to normal staffing tomorrow as it was closed this afternoon in preparation for this evenings event.

I have taken onboard what you have said and if I thought the information I gave you would be leaked to the press then we would have triple checked everything. This is not how we normally work. We would normally gather all the data we need to make our case findings and then go over it in fine detail and then present it.

I am am gathering the information you require as quickly as humanly possible.

Kind regards,  
James

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On 6 Sep 2018, at 17:53, James Brickhouse <[jbrickhouse11@gmail.com](mailto:jbrickhouse11@gmail.com)> wrote:

James - I hope to receive additional information today. I assume the team is still engaged in Pattaya?

Also, as you may expect, I have spent time over the last 24 hours compiling the information you've provided. Not to beat a dead horse, but to briefly revisit the point below, you never did report that the target is a child rapist. However you undoubtedly understand where the principal was drawing this conclusion from. You reported in multiple phone conversations that the age of the target's girlfriend (believed to be his wife at the time) would have put her in her teens when they 'married' and that she was quoted in a Thai news article saying they first met 7 years prior to that - which would have made her a very young teenager at the time. Some (all?) of this information has now proven to be wrong. They aren't married and her age is unconfirmed. I also haven't seen the Thai article you referenced. So while I agree that the comments by the principal were ill advised, you can understand that using the data you provided would have allowed him to draw this conclusion without you explicitly reporting it as fact.

J

On Wed, Sep 5, 2018 at 7:51 AM James Brickhouse <[jbrickhouse11@gmail.com](mailto:jbrickhouse11@gmail.com)> wrote:

There is no confusion where this is concerned. You have not reported this and I have not communicated it either. I understand your concern about self sabotage. A concern of mine as well.

On Wed, Sep 5, 2018 at 2:00 AM Jupiter Private <[info@jupiter-private.com](mailto:info@jupiter-private.com)> wrote:

Jared, I would like to state the following. At no time have I reported that the target is a child rapist.

We need to be clear about what we are looking for. The target had a traveling pattern that shows he spent time before he moved to Northern Thailand in Pattaya. We are qualifying what the target did on his travels and will report back as soon as we have that information.

What I can confirm is that he is about to launch libel action and we are working as quickly as possible to defuse that action by clearing showing a behavioural pattern that replicates a sex tourist. That task is now difficult time complete in a



covert way. The recent buzznews comments will be big news in Thailand. Tomorrow is the national celebration of the rescue & is still big news in Thailand.

I feel that an appropriate course of action is to try to avoid the public circus & instruct Kieth Oliver to meet with Marc Stephens to open a channel of communication whilst we attempt to continue our investigations. Every effort is being made to ensure accuracy & we know this now may required as evidence in a UK court & I would have to show how the evidence was collated.

I suggest a telephone call to discuss the strategy & impact.

Kind regards,  
James

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Jupiter Military & Tactical Systems  
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On 5 Sep 2018, at 01:20, Jared Birchall <[jaredbirchall@gmail.com](mailto:jaredbirchall@gmail.com)> wrote:

So are you saying you don't have the data gathered?

On Tue, Sep 4, 2018 at 3:53 PM Jupiter Military & Tactical Systems <[info@jupiter-private.com](mailto:info@jupiter-private.com)> wrote:

Jim,

I appreciate that you need quick results. I am very confident that we will get what we need from Pattaya.

I appreciate its open season on "the principle" holds the moral high ground and right now the less said is more.

Elon has nothing to prove to anyone!! Unsworth made this happen, not Elon.

We know Vernon is a 'bad boy' and we are close to having the evidence we need.

Jim I cannot stress enough that we need some time to qualify the data.

We will have one shot to get this right and I intent to do so,

Kind regards,  
James

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Jupiter Military & Tactical Systems  
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<image002.jpg>

<image002.jpg>

# EXHIBIT 4



**Elon Musk** @elonmusk · 28 Aug 2018

You don't think it's strange he hasn't sued me? He was offered free legal services. And you call yourself @yoda ...

717 176 1.7K



**Lin Wood**

@LLinWood

Follow

Replying to @elonmusk @yoda and 2 others

@elonmusk should check his mail before tweeting.

Los Angeles, CA 90077  
elon.musk@spacex.com

RE: Defamation of Vernon Unsworth

Dear Mr. Musk:

I have been retained by Vernon Unsworth to represent his interests in connection with the publication on your Twitter account of false and defamatory statements conveying that Mr. Unsworth is a pedophile. More specifically, you published through three different tweets to your twenty-two million followers that Mr. Unsworth engages in the sexual exploitation of Thai children, and you did so at a time when he was working to save the lives of twelve Thai children. You did so without any basis. According to a subsequent Twitter post, you did so out of anger.

I am in the process of preparing a civil complaint for libel against you. In an attempt to avoid litigation and to see the public record corrected, I invite you or your legal representatives to contact me.

Sincerely,

L. Lin Wood

# EXHIBIT 5

**Jeanine Zalduendo**

---

**From:** Taylor Wilson <twilson@linwoodlaw.com>  
**Sent:** Monday, September 23, 2019 1:15 PM  
**To:** Alex Spiro; Robert Schwartz; Alex Bergjans; Jeanine Zalduendo; Michael Lifrak  
**Cc:** Lin Wood; Matt Wood; Jonathan Grunberg; Nicole Wade; Chris Chatham; Kimmy Hart Bennett  
**Subject:** Unsworth v. Musk - Plaintiff Supplemental Production

[EXTERNAL EMAIL]

---

Counsel: Below please find a link to download Plaintiff's supplemental production for documents bates labeled VU03314-3414. With the production of these documents, Plaintiff has completed his production and responded to each of Defendant's meet and confer requests. Please let me know if you have any trouble accessing the documents. Thank you.

<https://www.dropbox.com/sh/5c5ozya7hsg8ghp/AAD52mHUxPAk8Yzxe7gLT9sOa?dl=0>

---

**G. Taylor Wilson**

Partner

L. LIN WOOD, P.C.  
1180 West Peachtree Street  
Suite 2040  
Atlanta, Georgia 30309  
Telephone: (404) 891-1402  
Direct Dial: (678) 365-4107  
Facsimile: (404) 506-9111  
E-mail: [twilson@linwoodlaw.com](mailto:twilson@linwoodlaw.com)

\*\*\* PLEASE NOTE OUR NEW SUITE NUMBER

# EXHIBIT 6



UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

VERNON UNSWORTH,

Plaintiff,

vs.

Case No. 2:18-cv-8048

ELON MUSK,

Defendant.

\_\_\_\_\_ /

VIDEOTAPED DEPOSITION OF  
VERNON UNSWORTH  
BEVERLY HILLS, CALIFORNIA  
AUGUST 14, 2019

Reported By:  
PATRICIA Y. SCHULER, CSR No. 11949

Job No.: 41370

August 14, 2019

1 be too many days if we're talking the 10th. It  
2 happened on the 13th, so there can't be much  
3 difference in the time for the request to the  
4 actual interview taking place.

5 Q. Before CNN interviewed you, did you know  
6 that the interview was going to be videotaped?

7 A. No.

8 Q. Was the entirety of the July 13 interview  
9 with CNN recorded, or just parts of it?

10 A. So far as I recall, the whole lot was  
11 recorded. That is what I recall; that is what I  
12 can say as I sit here today.

13 Q. Were you all excited about the fact that  
14 CNN wanted to interview you about the cave rescue?

15 A. No.

16 Q. Were you nervous at all about the CNN  
17 interview?

18 A. No.

19 Q. Did you have an agent or a publicist at  
20 that point?

21 A. No.

22 Q. Do you have one now?

23 A. No.

24 Q. Did you speak to anyone -- well, I'll  
25 back up again.

August 14, 2019

1 I, PATRICIA Y. SCHULER, a Certified  
2 Shorthand Reporter of the State of California, do  
3 hereby certify:

4 That the foregoing proceedings were taken  
5 before me at the time and place herein set forth;  
6 that any witnesses in the foregoing proceedings,  
7 prior to testifying, were duly sworn; that a  
8 verbatim record of the proceedings was made by me  
9 using machine shorthand which was thereafter  
10 transcribed under my direction; that the foregoing  
11 transcript is a true record of the testimony given.

12 Further, that if the foregoing pertains  
13 to the original transcript of a deposition in a  
14 Federal Case, before completion of the proceedings,  
15 review of the transcript [X] was [ ] was not  
16 requested.

17 I further certify I am neither  
18 financially interested in the action nor a relative  
19 or employee of any attorney of party to this  
20 action.

21 IN WITNESS WHEREOF, I have this date  
22 subscribed my name.

23 Dated: August 28th, 2019

24  
24

*Patricia Y. Schuler*

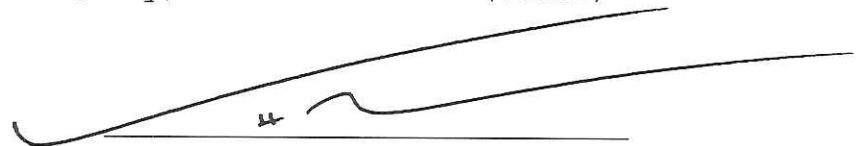
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PATRICIA Y. SCHULER, CSR NO. 11949

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I, VERNON UNSWORTH, do hereby declare under the penalty of perjury that I have read the foregoing transcript; that I have made any corrections as appear noted, in ink, initialed by me, or attached hereto; that my testimony as contained herein, as corrected, is true and correct.

EXECUTED this 16<sup>th</sup> day of SEPTEMBER,  
2019, at London, \_\_\_\_\_.  
(City) (State)



VERNON UNSWORTH

# EXHIBIT 7

Chat history with Thanet  
Saved on: 2019/08/10 13:16

2018/07/01(Sun)

7:34 Vern [Sticker]  
7:34 Thanet [Photo]  
7:37 Thanet [Photo]  
7:37 Thanet [Photo]  
7:37 Thanet [Photo]  
7:37 Thanet [Photo]  
8:05 Thanet [Photo]  
8:06 Thanet [Photo]  
12:17 Vern How are you doing in Phamee? VERY  
12:21 Thanet Call time 3:24  
12:22 Thanet [Photo]  
12:22 Thanet What do you think about this map  
12:24 Thanet It show the possibility flow rate of the water to the cave system. They base on information we have so far  
12:30 Vern We don't know as we have never been in the cave when both streams are flowing. The passage at the downstream end of Monk's Series are considerably smaller than those in the main passage.  
12:43 Thanet I see  
12:43 Thanet Tomorrow we will try to push the survey to close all small sink hole on the west side of Pa Mee like you suggest  
12:43 Vern [Sticker]  
13:19 Thanet Ok we got green light to survey, and man power, Do you think that we can have someone that assist us  
13:19 Thanet To assist us as advisor  
13:19 Thanet The west side of pa mee like you suggest  
15:21 Thanet Ok we got green light to survey, and man power, Do you think that you can spare someone that can assist us in the survey ?

The west side of pa mee like you suggest

15:21 Thanet [Photo]  
15:22 Thanet Parameter area that our team will survey tomorrow is in red circle.  
17:07 Vern My friend's British Divers get to the junction tonight. Water from Monks Series clear and water feel warmer than water from far end which is cloudy and colder. This means water in Monks Series has not travelled a long way underground?  
18:00 Thanet Yes  
18:00 Thanet Water from monk series is closer to recharge area on north side  
18:02 Thanet Which mean it has to be recharge from close by sink hole or crack  
18:05 Thanet I have my team working on the possible recharge area map on pa mee area for survey tomorrow I will send you copy when it done

2018/07/02(Mon)

1:01 Thanet [Photo]  
1:01 Thanet [Photo]  
1:01 Thanet Ok here it is  
1:02 Thanet 1. 589,371.418 2,254,893.748 Meters  
2. 589,255.662 2,254,814.373 Meters  
3. 589,206.053 2,254,771.378 Meters  
4. 589,030.766 2,254,774.686 Meters  
5. 588,971.235 2,254,599.399 Meters  
6. 589,483.866 2,254,179.372 Meters  
7. 589,067.146 2,254,162.836 Meters  
8. 588,743.031 2,254,083.460 Meters  
9. 589,004.307 2,253,726.272 Meters  
10. 588,547.900 2,253,964.398 Meters  
11. 588,779.411 2,253,679.970 Meters  
12. 588,759.567 2,253,613.824 Meters  
13. 588,544.593 2,253,593.980 Meters  
14. 589,060.532 2,253,504.683 Meters  
15. 589,040.688 2,253,375.699 Meters  
16. 588,640.505 2,253,250.021 Meters  
17. 588,475.140 2,253,226.870 Meters  
18. 589,457.407 2,254,023.929 Meters  
19. 588,580.973 2,254,959.894 Meters  
20. 588,653.734 2,255,095.494 Meters  
21. 589,649.231 2,254,070.231 Meters  
22. 589,725.299 2,254,880.519 Meters  
23. 589,817.903 2,254,635.779 Meters  
24. 589,900.585 2,254,314.971 Meters

5:19 Vern Not an easy caving trip and so much more to find in Monks Series. It's an interesting part of Tham Luang. May even have an upper series

5:19 Thanet Wow

5:20 Thanet That will be new discovery

5:20 Vern Let me have the info when convenient

5:20 Vern [Sticker]

5:20 Thanet Sure, will do

5:20 Vern Lot's of new passages to find

5:20 Thanet Being a caver must be very excited

5:21 Thanet Discover thing, go to the unknown

6:07 Vern [Sticker]

9:36 Vern [Photo]

9:49 Vern Where Monks Series Ends the passage then heads west for circa 400metres not yet surveyed. Most of the 400metres is crawling some flat out. It ends in a very low section which requires digging but you can see the passage continuing with still a strong draught

9:50 Vern Effectively it runs up the valley between the 2 large blocks of limestone

2018/11/11(Sun)

2018/11/13(Tue)

3:05 Thanet [Sticker]

3:05 Thanet Hi Vern

3:05 Thanet Sorry for late reply

3:05 Thanet Quite busy with work and stuff

3:05 Thanet [Photo]

3:05 Thanet [Photo]

3:05 Thanet They said he went to chamber 3

3:06 Thanet And also there is drama behind thus as well

3:06 Thanet The person who took musk and his team inside the cave should ask permission from the central command first

3:07 Thanet But instead they going in without permission but using influence to Prime minister to go in

3:08 Thanet Next day they were also fighting over this as many people specially Narongsak is very upset

3:09 Thanet Because of the rescue operation is undertaking that why they so stick with regulation at that time

3:09 Vern [Sticker]

3:10 Thanet No problem

3:10 Vern How r u

3:11 Thanet Good little busy with work here and coordinated with my team in Thailand that doing water work

3:11 Thanet What about you ?

3:11 Vern Busy and Tired

3:12 Thanet 555 you should take some time off

3:12 Thanet I heard that Matt's book is on sale tomorrow

3:12 Vern Have a meeting with Head of National Parks tomorrow morning at Tham Luang. Will be interesting (exclamation)

3:13 Vern Dr Harry and Dr Craig are asking for my help with the book they are doing

3:13 Thanet Ah great !!!

3:13 Vern <https://www.smh.com.au/world/asia/richard-harris-craig-challen-land-6m-book-movie-deal-on-thai-cave-20181105-p50e6r.html>

3:13 Thanet It will be wonderful for sure

3:14 Vern I now have an agent/representative

3:15 Thanet 555

3:15 Thanet That good, at least I'm sure they will have to pay you for permission

3:15 Vern You also need one (exclamation)

3:15 Thanet I wish they will be people pay me for my story 555

3:16 Vern You have gone out too soon with your daily diary

3:16 Thanet No one have seen it only you and Martin

3:17 Thanet Not even Matt

3:18 Thanet Did Matt have to pay you for the story and your corporation ?

3:18 Vern I can try help through my agent but not sure he needs it. He's a British Music Producer and Promoter very well connected throughout the film and music industry. He's 51 and doesn't neef to work. Lives in Chiangmai at the moment

3:19 Thanet Cool, that be great

3:21 Vern Not a £\$ from Matt (crazy) very stupid of us

3:21 Thanet 5555 same here

3:22 Thanet You know, we all should get together and write the book invloved our role in it in very detail

3:22 Thanet I'm sure many agency will love to pay us for our story

3:22 Thanet That's what Capt Dan recommend

3:23 Vern We have gone about it in the wrong way but some are only in it for themselves £££

3:23 Vern People can get greedy

3:25 Thanet 555

3:25 Thanet Too bad

3:26 Thanet Well I'm sure if John Chu movie will included our role, they will may give us some compensate or royalty fee

3:27 Vern You should see the email I've just received from Dr Harry and Dr Craig book writer. They NEED ME SO SO MUCH. Sent it on to my agent

3:27 Vern My agent is in touch with John Chu

3:28 Thanet I think they will pay you for your help

3:28 Thanet That nice, everyone know are very important in this rescue

3:29 Thanet You are \*\*

3:29 Vern I'm good to play hardball had enough of book writers and film companies taking the piss

3:30 Thanet [Sticker]

3:31 Thanet Well, if there is anything I could help you or Dr Harris, just let me know

3:32 Vern I will mate let me speak to my agent. I have also put him in touch with Josh

3:35 Thanet Cool.

3:36 Thanet Josh contact me the other day

3:36 Thanet He ask if I have any video of him on July 6

3:37 Thanet He mention about he writing his involvement in diary?

3:37 Thanet And almost done

3:38 Thanet And also said he will try to connect me with the UTA who is working with Ivanhoe production

3:55 Vern Will is seeing Josh later this morning in Chiangmai

4:07 Vern Don't jump in let them swet

4:10 Thanet Sure, no one contact me yet

4:10 Thanet Beside josh

4:11 Thanet I think all of us should stick together on this Vern

4:11 Vern [Sticker]

4:11 Thanet It might be better to present our story as a package

4:12 Thanet It will more valuable, most interesting story front and behind the scene that people don't know and if we can get British divers in with us it even better

4:15 Vern Leave the British Divers they are trying to do there own thing leave others out (exclamation)

4:15 Thanet Really?

4:16 Vern [Sticker]

4:17 Vern What is your LINE ID

4:18 Vern Forget about the divers OK

4:19 Thanet Sure,

4:19 Vern What is your LINE ID

4:19 Thanet Line ID: thanetnatisri

4:20 Vern I have sent to my agent his name Will Robinson

4:24 Thanet Cool, thank you

4:28 Vern Hollywood CAA want to meet with me in Maesai (exclamation)

4:31 Thanet Wow

4:31 Thanet That great !!!

4:31 Thanet [Sticker]

4:32 Vern Let them swet

4:33 Vern You sent me 3 videos in the war room on the 6th can send to me again

4:34 Thanet Sure, let me find it

4:34 Thanet It long time ago 5555

4:35 Vern I have them but cannot open say no longer available

4:35 Thanet There also a picture of private meeting between king guard, me, Lt Governor, Deputy General in there early July 6

4:35 Thanet In my diary, have you see it?

4:35 Vern What page

4:36 Thanet That meeting is the starting point on the whole July 6

4:36 Thanet I can't remember

4:36 Vern July 6 is such a key day

4:38 Thanet [Photo]

4:39 Thanet [Photo]

4:39 Thanet The first one is late July 6,

4:39 Thanet The second is morning July 6

4:40 Vern I got these already need the videos 3

4:40 Thanet [Photo]

4:41 Thanet This is how decision were made early July 6

4:42 Thanet At around 12:30 pm, the Minister of interior is on speak phone in middle of the table give us order to go head and start prepare dive rescue plan

4:42 Thanet I was not suppose to take this photo

4:43 Vern What is the map for

4:43 Thanet [Video]

4:43 Thanet [Video]

4:44 Thanet Map is for divert water on pamee area

4:44 Thanet [Video]

4:44 Thanet None of these video suppose to be taken

4:45 Thanet They are under strict order not to leak any of this out , But Colonel did take video anyway

4:46 Thanet \*meeting

4:48 Vern BRILLIANT



4:48 Vern [Sticker]  
4:49 Vern If I tell true story I risk being told to leave Thailand  
4:49 Thanet Not really,  
4:49 Thanet Not they are ok with it  
4:49 Thanet Now  
4:49 Thanet Now they ok, since many story had already been told by the American  
4:50 Vern Your story My story Josh story VERY POWERFUL  
4:50 Thanet So I ask them if that ok to show may video, they said is ok.  
4:51 Thanet Yes!!! That why I think we should put our story together. And present as a package  
4:51 Thanet It probably one of the most important piece that made this mission accomplish.  
4:52 Thanet With out you on June 26 meeting, without me and josh on July 5-6. None of this would never happened. They kid will dies for sure  
4:55 Vern The email I received from Hollywood CAA first line say: you (that's me) very much top of the list. Were it not for your experience, knowledge of the cave and swift response, it no exaggeration to say those boys would most likely not be alive today.  
4:55 Vern **I have not replied. Will my agent will control ££££££**  
4:56 Thanet That great !!  
4:56 Vern Sit tight  
4:56 Thanet I'm happy for you. You truly deserved it.  
4:57 Thanet [Sticker]  
4:57 Vern I will make the divers sugger for leaving us out of the loop  
4:57 Vern Suffer  
4:57 Thanet 5555  
4:57 Thanet They really shouldn't do that  
4:57 Vern You and Josh also deserve  
4:58 Thanet We are the one that fight hard, made decision happed. We set thing up for them to do the job  
4:58 Vern Events happened because of certain people coming together sometimes by chance meeting 555  
4:59 Thanet I think it because the divers, doctor are on spotlight  
4:59 Thanet Many people, media know them.  
5:00 Thanet But we are behind the scene don't get much chance to present ourself to the media while we were working  
5:00 Vern I'm ready to stick the boot in 555  
5:01 Vern I accept without the divers the kids wouldn't be alive  
5:02 Thanet But from 3 of us, I think you probably well know to public and media more. Since you were there in beginning and made the important decision meeting on June 26 and get divers in  
5:02 Thanet But story on behind on July 6 no one know  
5:02 Vern I know but I not the only one and yes July 6 no one knows  
5:04 Vern If they don't meet me the story is not worth anything ££££££  
5:05 Thanet Yes, Well let me know if there is any news developments regarding movie deal. It would be awesome if my part will be in it 5555.. I'm really appreated you look out for me Vern, that mean a lot  
5:06 Thanet And if there is anything I can help you. Please do not hesitate. Let me know, it always an honor to meet and work with you  
5:06 Thanet \*\*Appreciated  
5:07 Vern I will my friend. Don't worry I will keep you informed on what is happening.  
5:08 Thanet Thank you, I'm off to bed now. Will talk to you later  
5:08 Vern An honor for me also to know and work with you  
5:08 Thanet [Sticker]  
5:08 Vern [Sticker]  
8:08 Vern [Photo]  
8:08 Vern **My agent with Head of Wild Boars Committee Khun Sirisak**  
8:09 Vern <https://youtu.be/trGm2-qPXcE>  
8:09 Vern **Produced by my agent Will Robinson**  
17:32 Thanet [Sticker]  
17:33 Thanet That's wonderful

2018/11/14(Wed)

24:28 Thanet Just finish read some part of Matt's book  
24:28 Thanet It look wonderful  
1:10 Thanet He got a good story of Col. On decision making on July 6 too  
1:11 Vern I hope he will send me a copy 555  
1:12 Thanet Yes, I hope too  
1:12 Thanet I was impatient so I bought digital copy today for \$12  
1:12 Thanet Online  
1:12 Thanet [Sticker]  
1:13 Thanet He did get a few fact but not whole story from us specially details on July 5-6  
1:14 Thanet And there are so many part of story invloved you  
1:18 Vern [Sticker]  
1:38 Thanet [Photo]  
2:31 Thanet [Video]

2018/11/15(Thu)

8:28 Vern <https://www.smh.com.au/world/asia/richard-harris-craig-challen-land-6m-book-movie-deal-on-thai-cave-20181105-p50e6r.html>  
14:47 Thanet [Sticker]  
14:47 Thanet Wow  
14:47 Thanet I just read your email  
14:49 Thanet It is funny that, people wanted you to help them out. While they making fortune for themself...  
14:50 Thanet Ellis don't even mention about the offer they willing to give you on your cooperation

2018/11/16(Fri)

1:12 Vern **Will Robinson my agent will contact you if ok with you**  
1:19 Vern They want everything FREE. That's why no one should have helped Matt Guttman (exclamation) he will make a fortune. We have been very naive not just you and me but Josh and everyone else  
3:48 Thanet [Sticker]  
3:48 Thanet Yes  
3:51 Thanet Sure Vern, you can have will contact me anytime  
3:56 Vern Just sent you an email and copied in Josh  
4:09 Thanet [Sticker]  
4:09 Thanet It is good that all of us can stick together  
4:11 Vern Ellis has done a book deal with Ballantine. But he cannot interview Coach Ekk or the boys or me so the deal is dead in the water 555  
4:11 Vern <https://www.google.com/amp/s/deadline.com/2018/10/ballantine-books-thai-cave-rescue-into-the-dark-universal-world-english-rights-full-account-1202490327/amp/>  
4:15 Thanet First, no film or book will complete without the guy who know the cave better than anyone and pull everyone together, get diver in, push official to do the right thing on June 26

2) the guy who did water work, partial in charge and divert water section in rescue, that made dive rescue possible and help turn decision around on July 6

3) the guy who work inside negotiating between Thai and government and help push official to dive rescue on July 6

4:15 Thanet Yes 55555  
4:16 Thanet I think we have bargaining power,  
4:16 Vern [Sticker]  
4:45 Thanet [Photo]  
4:46 Thanet [Photo]  
4:46 Thanet Significant player hah?  
4:47 Thanet Obviously it won't complete without your role !!  
4:48 Thanet Like you said, it dead in the water  
4:48 Vern [Sticker]  
4:49 Thanet Some time I do wonder how come they made deal with driver, give them money and not the same to us?  
4:49 Thanet 5555  
4:49 Thanet It like they just over look us and looking for free pass  
4:51 Vern He cannot interview Coach Ekk or the boys Wild Boars Committee not allow  
4:55 Thanet Why would he announce it then  
4:55 Thanet That crazy  
5:30 Vern [Sticker]  
22:38 Thanet <https://www.thetimes.co.uk/article/thai-film-maker-will-beat-hollywood-with-story-of-cave-rescue-hs3xh8q59>

2018/11/17(Sat)

24:40 Vern The Cave film will not be shooting in Chiang Rai now they want to shoot in Sa Kaew province North East  
24:40 Vern He's only including 1 diver Jim Warny who arrived on the 7th and has excluded everyone else (exclamation) Waller is a WR  
24:53 Thanet 5555  
24:54 Thanet [Photo]  
24:55 Thanet Seem like he will also play the actor too, very interesting to see how it will turn out  
1:00 Vern This is a low budget film and I wish him the best.  
Our platform is "from Local To Global" and was well received by the selection committee.  
1:00 Vern Message from the Warner Bros guy (exclamation)  
1:02 Thanet [Sticker]  
1:03 Vern He will get very little cooperation by the government and they are monitoring his activities closely and to make certain that he and his team will not violate any rights.  
1:20 Vern He will not and can only write his script with readily available news /public information only .  
1:22 Thanet I see  
1:22 Thanet This is very tricky to deal with government agency indeed  
3:15 Vern [Photo]  
3:16 Vern [Photo]  
3:16 Vern [Photo]  
3:16 Vern [Photo]  
3:16 Vern [Photo]