

EXHIBIT 4

AFFIDAVIT OF ROBERT W. CONLEY

State of New York)
)
County of New York) ss.:

ROBERT W. CONLEY, Esq., being duly sworn, deposes and says:

1. I am the Director of Client Services for Rational Retention, LLC. (“Rational”) Rational is a full service eDiscovery and litigation support firm.
2. On or about February 15th, 2016, Boies, Schiller & Flexner LLP retained Rational for eDiscovery services in the matter captioned Giuffre v. Maxwell, Case No.: 15-cv-07433-RWS.
3. Rational performed a conservative form of de-duplication while processing and loading data for review in this matter.
4. The de-duplication process excluded only identical documents, as identified by the metadata values and family relationships, from the review set in this matter.
5. Documents whose substantive text may be identical may not be identified as duplicates because their respective metadata or family relationship may differ.



Robert W. Conley, Esq.

Sworn to me this 22nd day
of March, 2016



Notary Public

