

MARSH

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October 24, 2018

By email

Helen V. Cantwell, Esq.
Debevoise & Plimpton
919 Third Avenue
New York, NY 10022

Re: Dr. Reginald Archibald

Dear Ms. Cantwell:

Please let this letter serve as a follow-up to my letter dated October 18, 2018.

As stated in that letter, our law firm and Pfau Cochran Vertetis Amala PLLC jointly represent many of Dr. Archibald's former patients. They were patients at varying times during the 1950s through the 1990s.

Please let this letter serve as formal notice that our clients have legal claims against Rockefeller University and Rockefeller University Hospital, as well as its predecessor and successor entities (such as Rockefeller Institute), for sexual abuse they endured by Dr. Archibald during the above time frames. Accordingly, please advise all such institutions of their obligation to preserve evidence that may be discoverable.

This includes, but is not limited to, all records regarding:

1. Dr. Reginald Archibald
2. The staff who worked with Dr. Archibald, including nurses
3. Other doctors who worked with Dr. Archibald, including other doctors who worked in the same clinic as Dr. Archibald
4. Dr. Reginald Archibald's patients
5. Patients of the other doctors who worked with Dr. Archibald
6. Any investigation regarding Dr. Archibald, including the investigation from 2004 and 2018
7. Any complaints or concerns regarding Dr. Archibald, including the complaints from the 1990s and 2004 that are mentioned in the University's recent statement

8. Complaints, inquiries, or other statements made by Dr. Archibald's patients or on behalf of his patients as part of the University's independent inquiry into this matter, as referenced in the University's recent statement
9. Dr. Archibald's work during his time at Rockefeller University and/or Rockefeller University Hospital, including his research, his articles or his publications

I am writing to you with the understanding that you are legal counsel for Rockefeller University, Rockefeller University Hospital, and their predecessor and successor entities. If you are not legal counsel for those entities, please let me know so that I can ensure this letter is transmitted to each entity.

Sincerely,



Jennifer Freeman

cc: Michael Pfau, Esq.
Jason Amala, Esq.
James R. Marsh, Esq.
Robert Y. Lewis, Esq.