
**AN INITIAL RESPONSE TO BUZBEE PRESS CONFERENCE:
THE CASE OF PLAINTIFF NO. 1**

At a press conference today, attorney Anthony Buzbee introduced the first plaintiff to the media. She identified herself as Ashley Solis. In her remarks, Ms. Solis stated: “People say that I’m doing this just for money. That is false.”

Mr. Buzbee himself repeatedly claimed that the litigation he filed on behalf of other Jane Does “isn’t about money.” At his initial press conference on March 19 announcing the first wave of lawsuits, Mr. Buzbee stated: “The case ain’t about money. And it’s certainly ain’t about seeking publicity or fame. I personally don’t need it. And these women don’t want it. This case is about female empowerment.”

In fact, according to the documentation below, Mr. Buzbee sought \$100,000 in hush money on behalf of Ms. Solis to quietly settle the allegations the month before he filed the first lawsuit.

“My client’s demand is \$100,000,” Buzbee associate Cornelia Brandfield-Harvey wrote in a February 9, 2021 email on behalf of Ms. Solis. Ms. Brandfield-Harvey followed up with a clarification of the \$100,000 demand later that same day. “This offer remains open until Friday of this week.” Mr. Buzbee is copied on all of the emails.

The Watson representative who engaged in the discussions with Mr. Buzbee and his firm is Scott Gaffield, the General Counsel at the Athletes First agency of Laguna Beach.

On February 19, Mr. Gaffield responded to Mr. Buzbee and Ms. Brandfield-Harvey by inquiring about “the rationale behind the \$100k demand” given that “we don’t believe that the alleged facts show that Deshaun did anything wrong...”

Mr. Buzbee responded that same morning: “We made a legit demand. You rejected it. We won’t be making another or bid against ourselves.” He then added: “This is Houston, Texas. Perhaps you should find him a lawyer here so you can apprise both you and your client of the landscape here and who you are dealing with.”

In a written statement, Mr. Gaffield said:

“My email exchanges with Mr. Buzbee and Ms. Brandfield-Harvey were very clear. We did not think that the facts showed that Deshaun did anything wrong with their client. We believed then – and fully believe now – that Deshaun learned a lesson about putting himself in this type of situation by interacting with people he does not know. As the emails show, we were willing to continue discussions on Deshaun’s behalf to explore ways to prevent a lawsuit and a public spectacle. But Mr. Buzbee informed us that he was unwilling to do so. We expect that this matter will be resolved in court.”

The email communications occurred between February 3 and February 19, 2021. Below are the email exchanges in their entirety:

From: Cornelia Brandfield-Harvey <cbrandfieldharvey@txattorneys.com>
Sent: Wednesday, February 3, 2021 8:52 AM
To: Scott Gaffield <sgaffield@athletesfirst.net>
Cc: Anthony Buzbee <Tbuzbee@txattorneys.com>
Subject: Deshaun Watson

Hello Mr. Gaffield,

I am writing this email to follow up on our phone conversation from yesterday. We are of the strong position that we need a mediator for any settlement negotiations going forward in this matter. We believe it is in the best interest of all parties to have a mediator in order to protect any discussions.

If you are agreeable, we can circulate a list of names of mediators that we have used in the past and potential dates and times for mediation via Zoom.

If there are mediators that your office would like to propose, we will consider your suggestions.

Please let us know.

Thank you.

Sincerely,

Cornelia Brandfield-Harvey
Associate Attorney
The Buzbee Law Firm

From: Scott Gaffield <sgaffield@athletesfirst.net>
Sent: Wednesday, February 3, 2021 11:42 AM
To: Cornelia Brandfield-Harvey <cbrandfieldharvey@txattorneys.com>
Cc: Anthony Buzbee <Tbuzbee@txattorneys.com>
Subject: Deshaun Watson

Thanks Cornelia.

Tony, do you have a moment to connect by phone today? I would be happy to speak with you both jointly, if you would prefer.

Thanks

Scott Gaffield

From: Cornelia Brandfield-Harvey <cbrandfieldharvey@txattorneys.com>
Sent: Wednesday, February 3, 2021 12:13 PM
To: Scott Gaffield <sgaffield@athletesfirst.net>
Cc: Anthony Buzbee <Tbuzbee@txattorneys.com>
Subject: Re: Deshaun Watson

Scott,

Yes certainly we can all connect by phone.

We are not available today.

But we are available anytime before 12:00 pm CST/10:00 am PST tomorrow or anytime after 10:00 am CST/8:00 am PST on Friday for a phone call.

Let us know if these times work for you.

Sincerely,

Cornelia Brandfield-Harvey

From: Scott Gaffield <sgaffield@athletesfirst.net>
Date: Wednesday, February 3, 2021 at 12:37 PM
To: Cornelia Brandfield-Harvey <cbrandfieldharvey@txattorneys.com>
Cc: Anthony Buzbee <Tbuzbee@txattorneys.com>
Subject: RE: Deshaun Watson

Ok great, let's do 9am PT tomorrow. Let me know if there is a dial-in that I should use, or if you guys will just call my cell phone then [REDACTED].

From: Cornelia Brandfield-Harvey <cbrandfieldharvey@txattorneys.com>
Sent: Wednesday, February 3, 2021 12:40 PM
To: Scott Gaffield <sgaffield@athletesfirst.net>
Cc: Anthony Buzbee <Tbuzbee@txattorneys.com>
Subject: Re: Deshaun Watson

Scott,

Sounds good. We will just call your cell phone.

Talk to you then.

Sincerely,

Cornelia Brandfield-Harvey

From: Scott Gaffield <sgaffield@athletesfirst.net>
Date: Tuesday, February 9, 2021 at 2:24 PM
To: Cornelia Brandfield-Harvey <cbrandfieldharvey@txattorneys.com>
Cc: Anthony Buzbee <Tbuzbee@txattorneys.com>
Subject: RE: Deshaun Watson

Hi Tony and Cornelia,

Hope you both had a nice weekend. Checking in to see if you had a chance to discuss our conversation regarding potential paths forward.

Thanks,
Scott

From: Cornelia Brandfield-Harvey <cbrandfieldharvey@txattorneys.com>
Sent: Tuesday, February 9, 2021 4:29 PM
To: Scott Gaffield <sgaffield@athletesfirst.net>
Cc: Anthony Buzbee <Tbuzbee@txattorneys.com>
Subject: Re: Deshaun Watson

Hi Scott,

Thank you for touching base.

We have had time to discuss this option amongst ourselves and with our client and we are willing to move forward with settlement negotiations without a mediator.

Therefore, my client's demand is \$100,000.

Please let us know Mr. Watson's response.

Sincerely,

Cornelia Brandfield-Harvey

From: Scott Gaffield <sgaffield@athletesfirst.net>
Date: Tuesday, February 9, 2021 at 7:22 PM
To: Cornelia Brandfield-Harvey <cbrandfieldharvey@txattorneys.com>
Cc: Anthony Buzbee <Tbuzbee@txattorneys.com>
Subject: RE: Deshaun Watson

CONFIDENTIAL SETTLEMENT COMMUNICATION

Thanks – received, and will be in touch.

From: Cornelia Brandfield-Harvey <cbrandfieldharvey@txattorneys.com>
Sent: Tuesday, February 9, 2021 8:08 PM
To: Scott Gaffield <sgaffield@athletesfirst.net>
Cc: Anthony Buzbee <Tbuzbee@txattorneys.com>
Subject: Re: Deshaun Watson

CONFIDENTIAL SETTLEMENT COMMUNICATION

Scott,

This offer remains open until Friday of this week.

Thanks.

Sincerely,

Cornelia Brandfield-Harvey

From: Scott Gaffield <sgaffield@athletesfirst.net>
Date: Wednesday, February 10, 2021 at 5:08 PM
To: Cornelia Brandfield-Harvey <cbrandfieldharvey@txattorneys.com>
Cc: Anthony Buzbee <Tbuzbee@txattorneys.com>
Subject: RE: Deshaun Watson

Cornelia,

Do you and Tony have an openings to discuss your offer today or tomorrow?

Thanks
Scott

From: Cornelia Brandfield-Harvey <cbrandfieldharvey@txattorneys.com>
Sent: Wednesday, February 10, 2021 5:15 PM
To: Scott Gaffield <sgaffield@athletesfirst.net>
Cc: Anthony Buzbee <Tbuzbee@txattorneys.com>
Subject: Re: Deshaun Watson

Scott,

I am available for a phone call tomorrow in the morning.

9:00 am PST work for you?

Sincerely,

Cornelia Brandfield-Harvey

From: Scott Gaffield <sgaffield@athletesfirst.net>
Sent: Wednesday, February 19, 2021 10:49 AM
To: Cornelia Brandfield-Harvey <cbrandfieldharvey@txattorneys.com>
Cc: Anthony Buzbee <Tbuzbee@txattorneys.com>
Subject: Re: Deshaun Watson

CONFIDENTIAL SETTLEMENT COMMUNICATION

Hi Cornelia & Tony,

Following on my call last week with Cornelia, wanted to check in on this to see if Ms. Solis wanted to either help us understand the rationale behind the \$100k demand or come back with a different figure. As I said to Cornelia last week, we don't believe that the alleged facts show that Deshaun did anything wrong with regards to Ms. Solis, but we are nevertheless happy to continue the conversation around a reasonable settlement figure because we believe he can learn a lesson about having put himself in this situation.

Thanks,
Scott

From: Anthony Buzbee (Tbuzbee@txattorneys.com)
Sent: Friday, February 19, 2021 11:10 AM
To: Scott Gaffield (sgaffield@athletesfirst.net)
Cc: Cornelia Brandfield-Harvey (cbrandfieldharvey@txattorneys.com)
Subject: Re: Deshaun Watson

We made a legit demand. You rejected it. We won't be making another or bid against ourselves. We also won't be having an extended dialogue about why you think your client did nothing wrong or how you want this to be a "learning" experience for your "high profile athlete," as you refer to him. This is Houston, Texas. Perhaps you should find him a lawyer here so you can apprise both you and your client of the landscape here and who you are dealing with. Talk soon.

Tony Buzbee

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