

EXHIBIT A



Isaac



I'm going to my gynecologist tomorrow morning

Okay

So after I guess?

Yeah sure

Let me know when is a good time

Alright depends on when my appointment is.

Ok



I know right? 😊

Annoying lil shit. Chlamydia is a such a shit to get rid of. In one day the whole frickin deal can fuck you up and change 😊



iMessage



EXHIBIT B



Isaac



No I'm just thinking about getting it taken care of then that. But we can't take care of it until tomorrow so I'm not really sure what to do

I don't know what to do either

Well let's just have the appointments and meet tomorrow

Okay...

I'm so sorry. Goddamn it I feel like such an asshole. I should've worn one until I knew for sure, and even then still worn one.

Fuck... I'm so sorry

I wouldn't beat yourself up about it too much.

Well I mean wtf it could **EASILY** been prevented

I just had to frickin grow up



iMessage



EXHIBIT C



yes girl i'm aware of that. but apparently you had been talking about other people you had hooked up with and he was saying it so you weren't the only one



I wasn't

Do you want more screenshots?



yes

Ok give me a second

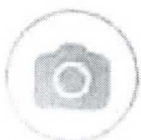
Yet here I am

Yeah no kidding... damn I feel horrible

I'm so sorry

I'm pretty upset I'm not going to lie

Well if anything hold it against push cause these mfers told me I was clean



Write a message...



EXHIBIT D



[Redacted contact name]



You accepted the request

what does that mean?

6/13/17, 7:59 PM ✓



isaac haas

Yesterday 12:48 PM

do i know you

Yesterday 6:40 PM ✓

2 unread messages

no but a friend of mine was infected by haas too, also [Redacted] the list is LONG

just warning you someone needs to stand up and make him pay for what he's doing everyone is too scared



12:14 PM



Start a message



EXHIBIT E



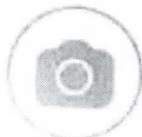
Contact with a lawyer

he says he never got formally tested. that the doctor just believed him when he said he was showing symptoms and gave him medicine

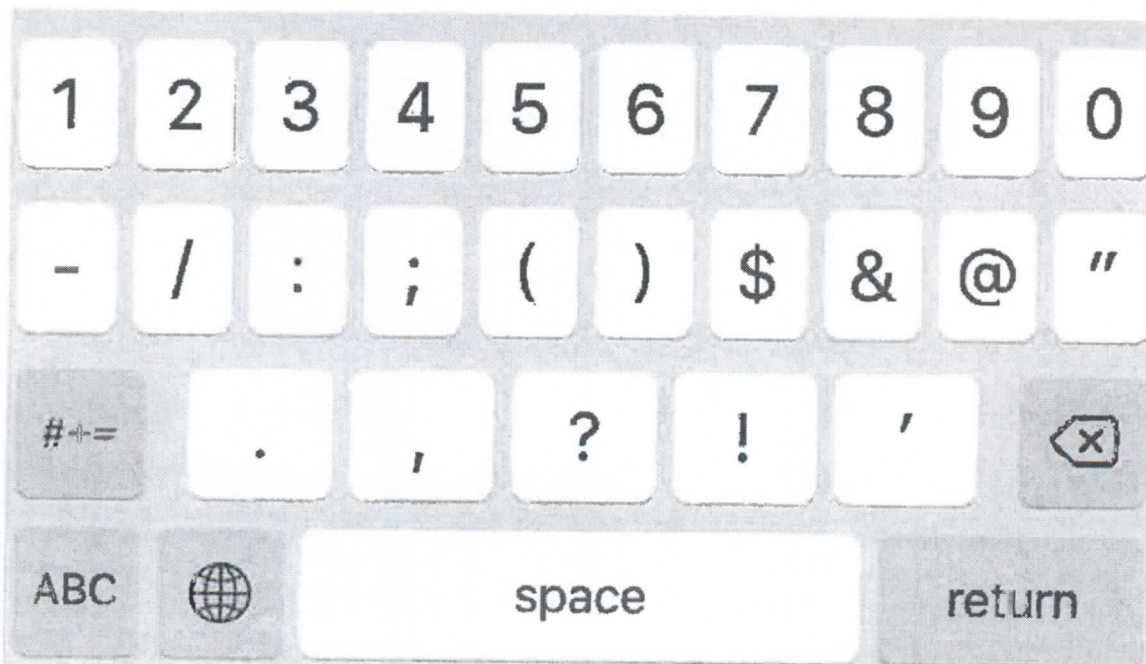


because he's technically not been "diagnosed" with herpes either

He is full of shit. I have texts where he said he was formally tested before we had sex. And I have texts where he talked about having a q tip up his penis when they were "testing" him.



Write a message...





because he's technically not been
"diagnosed" with herpes either

He is full of shit. I have texts where he said he was formally tested before we had sex. And I have texts where he talked about having a q tip up his penis when they were "testing" him.

i tried to get him with a lawyer because i didn't find out about herpes until i was 6 months into the relationship. our families went at it, and he's never formally been tested for herpes so i couldn't do anything

he has never been tested. perks of being an athlete, the doctor just gives you meds. he told you he was tested so you would sleep with him



because he can say "he didn't know"

Well now that you've told me that I have proof that he knew.



Write a message...



EXHIBIT F



isaac



yeah you said that before isaac

I have to pay for my actions.
Either in money, or a charge.

you are right. maybe this will
finally be an eye opener that
you can't just take the easy
way out of everything

10,000 or 6 months to 50 years
in jail depending on extremity
of disease

I'm literally freaking out

You know I have to deny
everything. Deny knowing. All
that

why

Delivered

In order to lessen the sentence



iMessage





isaac



I'm literally freaking out

You know I have to deny everything. Deny knowing. All that

why

In order to lessen the sentence

Please keep this between us

Try to talk her down if anything

she has her mind pretty set

Why not

i can't persuade her

What were you saying?

i can't talk her down? what am i supposed to say. oh please don't do it??



iMessage





isaac

Just be like please don't. He's learned his lesson. He will do what it takes to make it right. But putting him in jail isn't gonna do anything but ruin other people's lives and put HER name in public conversation of being infected with herpes

Because all criminal files are public information. And if the media gets ahold of that, then not only will it blow up, but her name will be all over it too.

you can't do anything to make it right isaac. that is something she will live with for the rest of her life?

Yes I know. And I feel horrible about it. But she wants to not only ruin my life, but others around me, and put her name out there like that?



iMessage



EXHIBIT G

Writer's e-mail: msimmons@humesmith.com

September 7, 2017

VIA HAND DELIVERY

Isaac Haas

RE: Notice of Claim and Demand For Preservation of Electronic Data, Documents, and Materials relevant to proving the cause and extent of Ms. Alyssa Chambers' injuries incurred in the Spring/Summer of 2017

Dear Mr. Haas:

Our firm represents Ms. Alyssa Chambers (hereinafter "Alyssa"), who has suffered injuries as a result of your intentional, negligent, willful and reckless conduct. As you are aware, Ms. Chambers contracted sexually transmitted diseases during a sexual relationship with you. Your failure to notify her of your STD status, which was known to you -- and previous sexual partners -- prior to engaging in sexual intercourse with our client is a violation of Indiana law and represents tortious and despicable conduct. Bluntly, our client was not a willing participant in sexual intercourse where proper notification of the heightened risk of an STD exposure was not given. Further, your representations and assurances to Alyssa that you previously submitted to, and were cleared by, a sexually transmitted disease test at Purdue University Student Health (PUSH) was a clear and obvious misstatement made for the purpose of negligently, recklessly and intentionally assuaging our client of a known risk of STD contraction. Your desire to engage in sexual intercourse with Alyssa, while making false statements regarding your STD status, adds insult to injury to our client who has tested positive for the Herpes Simplex Virus. As I am sure you are aware, our client's injuries are lifelong as a result of this diagnosis.

Prior to engaging in formal litigation, we instruct that you provide this letter to any insurance carrier with applicable liability/boldly injury coverage and/or to your legal counsel and refrain from contacting our client in any way shape or form. We request immediate contact from your counsel and/or insurance carrier for the purpose of discussing this matter prior to initiating a lawsuit in the applicable court.

**DEMAND FOR PRESERVATION OF EVIDENCE AND
ELECTRONIC MEDIA, ALL COMMUNICATIONS**

In addition to notifying you of our client's intent to file a lawsuit, this letter is a demand to preserve all potentially relevant evidence that proves the cause and extent of Alyssa's injuries. Such potentially relevant evidence may include, but is not limited to, any text messages, instant

messages, emails, Facebook messages, Instagram messages, telephone records between you and our client, and you any third party including, but not limited to, '██████████' aka ██████████ regarding our client, your STD status or any other conduct of a sexual nature, and so on. Certain electronic data, documents, and materials, or electronically stored information ("ESI"), have been determined to be relevant in this matter and you are given notice that you are required to preserve the ESI which may contain evidence relevant to proving the cause and extent of the injuries suffered by Alyssa, including, but not limited to, the communications with third-parties and social media posts or messages (the scope of this preservation request is more fully discussed below).

We believe ESI to be an important and irreplaceable source of discovery and/or evidence. Current law and rules of civil procedure clearly apply to the discovery of electronically stored information just as they apply to other evidence, and confirm the duty to preserve such information for discovery. You must take all reasonable steps to preserve this information until this legal matter is finally resolved. Failure to take the necessary steps to preserve the information addressed in this letter or other pertinent information in your possession or control may result in serious sanctions or penalties during the course of future litigation.

The matter requires preservation of all information from your computer systems, mobile phones, electronic cloud storage, tablets, removable electronic media, and other locations. Any and all ESI deemed potentially relevant in addition to any noted herein, must be preserved. This preservation notice and the description of potentially relevant ESI shall in no way constitute the entirety of the ESI you are obligated to preserve, but a minimum requirement based upon the current understanding of your mobile device/computer systems, as well as computer systems in general. These mobile device/computer systems may be owned or maintained by you, your employees, friends, teammates, interns, third parties or contractors.

Electronic data has been deemed relevant or potentially relevant in this matter. As a result, you have a duty to take all reasonable steps to preserve any and all electronic information potentially relevant to this matter. Electronically stored data can easily be altered, deleted, modified, corrupted or otherwise changed. Accordingly, you must take every reasonable step to preserve this information until the final resolution of this matter. Your obligation to preserve relevant and potentially relevant ESI includes, but is not limited to:

- Halting any process that destroys data, including but not limited to data destruction procedures (manual or automatic) and backup cycling;
- Discontinue all data destruction and backup tape recycling policies;
- Preservation of all relevant or potentially relevant hardware;
- Preserve any and all systems used to make data readable or usable including, but not limited to, passwords, encryption schemes, proprietary hardware or databases, or specialized software or hardware;

- Preserve and not destroy passwords, decryption procedures (and accompany software), network access codes, ID names, manuals, tutorials, written instructions, decompression or reconstruction software;
- Maintain all pertinent information and tools needed to access, review, and/or reconstruct all requested or potentially relevant electronic data.

Preservation of all ESI that is relevant or potentially relevant to this matter is required. This ESI includes, but is not limited to, word processing documents, spreadsheets, databases, accounting and financial data files, digitized corporate and business records, electronic voice/audio and fax, files, calendars, telephone logs, time and billing records, contact manager information, documents, user created files, email and other communications, schedules and Internet usage data and system files and logs in your possession, the possession of your employees or third parties or contractors.

Electronically Stored Files – You are required to preserve:

- Active data (data readily available to a user) including, but not limited to:
 - Text messages;
 - Electronic mail (email);
 - Instant Messages;
 - Chat sessions;
 - Social media postings;
 - Electronic medical records;
- Archive data (backups, local or otherwise)
- Deleted data (data deleted by a user or a system process but still recoverable through forensic methods)
- Media used to house active data and media used to house backup data as well as any hardware specifically required to access the media (hard disk drives, tape drives, magneto-optical drives, etc.)

Email – you are required to preserve all email data relevant to or potentially relevant to this matter in original electronic format.

Devices and Hardware – you are required to preserve all electronic devices that contain data potentially relevant to this matter, whether currently in use or not including any and all portable devices that contain or may contain relevant or potentially relevant data. No hardware devices containing relevant or potentially relevant data shall be destroyed, disposed of, repurposed or altered in any way that could cause damage or alterations to the electronically stored data contained within them.

Internet Usage Data – you are required to preserve any and all Internet usage data stored locally or otherwise including but not limited to browser logs, history data and Internet ‘cookies’.

Social Media – you are required to preserve any and all social media files and files relating to individual computer systems and their usage. You are required to preserve and not destroy passwords, decryption procedures (and accompanying software), network access codes, ID names, manuals, tutorials, written instructions, decompression or reconstruction software.

System Files and Logs – you are required to preserve any and all system files relating to individual computer systems and their usage.

In order to demonstrate compliance with your duty to preserve ESI, you must maintain a log of all alterations or deletions of data made to any ESI location, device or file indicating when the change was made, specifics of the content of the change, the reason for the change and who made the change.

Any and all physical devices, hard drives, computer systems and other sources of ESI that contain relevant or potentially relevant data shall be listed on a chain of custody document indicating the location of the item, the custodian of the item and any unique identifying information for the item such as a model and serial number. All electronic data and ESI created that qualifies per the content of this letter for preservation shall be preserved in accordance with the steps outlined herein to ensure proper preservation.

Compliance and preservation obligations also include forwarding a copy of this letter to all individuals, organizations and entities that are responsible for any of the items referred to herein including, but not limited to, Purdue University. The content of this preservation notice is not meant to be all inclusive and does not preclude the Requests for Discovery and Interrogatories that will follow.

We appreciate your compliance with our demands for preserving evidence and look forward to hearing from your legal counsel and/or insurance carrier in the near future.

Very truly yours,

HUME SMITH GEDDES GREEN & SIMMONS, LLP

Michael E. Simmons

MES:vm

EXHIBIT H



hey. i caught wind of isaac getting his papers and that my name was mentioned via one of the coaches. i don't want any part of this, nor can i. with nursing school, my godmom having cancer and my dad being deployed, i ask that if it's possible, please do not call me in to testify. i don't know if that was your plan or not, i just ask you not too. a lot of the stuff you heard from me wasn't true because i was mad at isaac and i was trying to intentionally fuck with you. just letting you know.



Write a message...



EXHIBIT I

November 1, 2017

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Highest Ranking Officer
Purdue Men's Basketball
Mackey Arena, Room 2258
900 John R. Wooden Drive
West Lafayette, Indiana 47907

Office of the Attorney General
Attn: Tort Claim Investigations
Indiana Government Center South, 5th Floor
402 West Washington Street
Indianapolis, Indiana 46204-2770

Mitchell E. Daniels, President
Purdue University
Hovde Hall, Room 200
610 Purdue Mall
West Lafayette, Indiana 47909-2040

Highest Ranking Officer
Purdue University Student Health Center
601 Stadium Mall Drive
West Lafayette, Indiana 47907

Indiana Political Subdivision
Risk Management Commission
311 West Washington Street, Suite 300
Indianapolis, Indiana 46204

Athletics Director
Office Of Sports Administration
Mackey Arena, Room 2315
900 John R. Wooden Drive
West Lafayette, Indiana 47907

NOTICE OF TORT CLAIM

Re: **Jane Doe v. Anonymous Purdue Student 1, Purdue University Student Health Center, Purdue University Men's Basketball, and Purdue University Athletic Department**

To Whom It May Concern:

1. Name and Address of Claimant:

Jane Doe
214 Marstellar Street, Apartment 23
West Lafayette, Indiana 47906

2. Location, date and time of the alleged occurrence:

Claimant entered into a sexual relationship with the Anonymous Purdue Student 1 in West Lafayette, Indiana on or about May 15, 2017 and thereafter. As a result of this sexual relationship, Claimant suffered injuries and damages which are expounded upon below. Anonymous Purdue Student 1 is not being identified by name due to concerns of privacy related to confidential health information. For the purpose of additional investigation and identification, Anonymous Purdue Student 1 is represented by attorney Brian W. Walker, of the law firm Ball Eggleston, LLC, 201 Main Street, Suite 810, P.O. Box 1535, Lafayette, Indiana 47902-1535. Mr. Walker's telephone number is (765) 742-9046. The actions of the Purdue University Student Health Center, Purdue University Men's Basketball program, and Purdue University Athletic Department took place on or around the Purdue University campus in West Lafayette, Indiana. Some acts of negligence and/or intentional wrongdoing by the Purdue University Student Health Center, Purdue University Men's Basketball program, and Purdue University Athletic Department occurred prior to and following Claimant's sexual relationship with Anonymous Purdue Student 1. The exact dates of the negligent and/or intentional acts is not known at this time.

3. Short and plain statement of the facts on which the claim is based:

Claimant entered into a relationship with Anonymous Purdue Student 1 on or about May 15, 2017. Anonymous Purdue Student 1 assured Claimant he had submitted to a sexually transmitted disease test at Purdue University Student Health (PUSH) and that Anonymous Purdue Student 1 was negative for all sexually transmitted diseases. Claimant proceeded to engage in sexual intercourse with Anonymous Purdue Student 1 including, but not limited to, sexual intercourse without a condom and oral intercourse. On or about June 2, 2017, Claimant began to notice symptoms consistent with a recent contraction of a sexually transmitted disease: vaginal lesions, fever, chills, pain, etc. Claimant submitted to a sexually transmitted disease test on or around June 7, 2017. The results of said test were positive for the Herpes Simplex Virus. Claimant did not engage in intercourse with anyone other than Anonymous Purdue Student 1 during the above timeframe.

Claimant later learned that Anonymous Purdue Student 1 knew or should have known he was positive for the Herpes Simplex Virus because other intimate partners had contracted the Herpes Simplex Virus from Anonymous Purdue Student 1 prior to his engaging in intercourse with Claimant. Claimant confronted Anonymous Purdue Student 1 with this information, which was, at first, denied. Anonymous Purdue Student 1 told other third parties via text message that he would have to deny any allegations to lessen his potential criminal sentence and civil judgment liability. Claimant later learned that PUSH medical providers and members of the athletic department may have been aware of Anonymous Purdue Student 1's STD status. Further, Claimant learned that PUSH medical providers and members of the athletic department provided Anonymous Purdue Student 1 with "off the books" medical services for the purpose of keeping said medical treatment and care unrecorded and out of reach of other students, the news media and/or other interested parties. Moreover, following receipt of Claimant's counsel's letter of representation, Anonymous Purdue Student 1 and members of the Purdue University Athletic

Department attempted to contact Claimant, through a third-party intermediary for the purpose of discrediting Claimant's claim(s) for damages and to intentionally and negligently cause Claimant emotional distress.

4. Damages and/or injuries sustained:

Due to the negligence and intentional acts of Anonymous Purdue Student 1, Purdue University Student Health (PUSH), the Purdue Men's Basketball team, and the Purdue University Athletic Department, Claimant sustained pain and suffering, additional medical expenses, future medical expenses, future pain and suffering, permanent injury, and emotional distress.

5. Extent of loss or repair if known:

The full extent of the claimant's injury is not yet known at this time. Claimant continues to seek medical treatment for her physical and mental injuries, some of which are considered life-long.

6. Amount of damages sought:

At this time, the claimant seeks damages of \$1,000,000.00.

7. The residence of the person making the claim:

Jane Doe is making a claim by counsel. Claimant resided at [REDACTED] West Lafayette, Indiana 47906 during these events. She can be contacted by counsel:

Michael E. Simmons
HUME SMITH GEDDES GREEN & SIMMONS, LLP
54 Monument Circle, 4th Floor
Indianapolis, Indiana 46204
(317) 632-4402
msimmons@humesmith.com

Very truly yours,

HUME SMITH GEDDES GREEN & SIMMONS, LLP

Michael E. Simmons

MES:lmh