

- EMAILS IN THIS CHAIN HAVE BEEN ASSEMBLED IN CHRONOLOGICAL ORDER

From: [REDACTED - A TWL LAWYER]

Sent: Friday, April 14, 2023 4:42 PM

To: WRowan <[REDACTED]>

Subject: TWL/MM4A - framework for continuing working relationship

Hi, Wingham. This is a follow-up to our most recent conference and subsequent email exchanges. The attached was prepared by Adrian to summarize TWL's proposed framework for a continuing working relationship. You will note the firm commitment for funding through May (to be prepaid in April in accordance with past practice). While TWL is committed to continued funding thereafter through the expected completion of the design sprint at year-end, it is subject to continued fundraising. Further, all of this is subject to review and approval by the Board, which is expected to meet next week. We will get back to you with a further update at that time.

Please let me know if you have any questions. I hope you have a great weekend.

Regards,

[REDACTED - NAME OF A TWL LAWYER]

From: WRowan <[REDACTED]>

Date: Sunday, April 16, 2023 at 9:53 AM

To: Adrian Haro <[REDACTED]>

Subject: FW: TWL/MM4A - framework for continuing working relationship

Hey Adrian,

This email [SHOWN ABOVE] from the lawyers is pointless, as you will have realized. It tells me nothing I don't already know:

- The April-for-May disbursements were confirmed weeks ago and reconfirmed a few days ago from your end.
- Commitments without dates are no help with planning at this end.

What the email has done is exposed the fragility of any commitment from TWL. You have already pledged intent to fund through to end of 2023. But as soon as we seek confirmation for next month's disbursement the question gets dodged with yet-again confirmation of this month's disbursement.

And, I have always been acutely aware of how unpredictable fundraising can be. That's why for example we don't use lawyers here unless absolutely essential, and even then only the best value ones. And it's why we develop skills in-house rather than relying on consultants and paid partners.

We could talk on Tuesday or Thursday but is there any point? There's a gulf in our thinking that I can't see being recognized. I believe that TWL – for moral, strategic, and tactical reasons – should focus on slimming down, and center itself primarily around getting this design sprint to success over the next year. That would give you momentum, relationships, and recognition on which to expand.

And as I said on our last call, I am dismayed you are spending so heavily on lawyers when my complaint made clear I would be happy with any independent third party brokering resolution. I suspect someone like [REDACTED - TWL ADVISOR] could have had us amicably on a new path by now. It's not just spending all that philanthropic cash on [REDACTED - LAW FIRM] while plunging the design sprint into wind-down mode that should cause concern: [REDACTED - LAW FIRM] have made TWL's likely situation worse with clumsy attempts to intimidate people whose issues they're investigating. (Even after it was clear how easily the saga could end up in the press!)

And, assuming it was [REDACTED - LAW FIRM] who wrote the summary from you below, you might want to ask them why section 3 – the final section – makes a clause “subject to 4(b)(i) above”. There is no clause 4(b)(i) or even a section 4, and if there was it would be below.

As ever, no hard feelings. It's all very sad. And if you want to talk then [REDACTED - TWL STAFFER] can see when I am free before 10AM your time and issue an invite. But you and I aren't on billable hours and both have other issues to tackle. I'm easy either way. I suspect you won't act on it, but my suggestion is let's just talk without lawyers and no expectation of commitments on either side, just sharing of thoughts. Up to you!

All the best

Wingham

From: [REDACTED - A TWL LAWYER]

Date: Thursday, April 20, 2023 at 10:01 AM

To: WRowan <[REDACTED]>

Subject: RE: TWL/MM4A - framework for continuing working relationship

Wingham,

Per your request, this is a written follow-up to our conference a few moments ago. Specifically, please note the following:

- As we discussed, at this time The Workers Lab (TWL) is willing and intends to continue to work in good faith to complete the design sprint (including the launch of the pilot programs, an impact analysis, and publication of TWL's findings), as described in the memo that Adrian previously provided (re-attached for your reference). TWL continues to put forth its best efforts to make this happen and Adria and the TWL team are confident that their efforts will be successful (including TWL's continuing fundraising). Obviously, if you are not willing to continue on that basis at this time, that would be your decision.
- TWL's Board is currently scheduled to convene on Friday, 4/28, to discuss (a) your complaint and determine what, if any, corrective measures should be taken by TWL; and (b) whether TWL should continue with its work on the design sprint, and if so, the framework for doing so.
- I will follow up with [REDACTED - ANOTHER TWL LAWYER] regarding the status of the report regarding your complaint.

Regards,
[REDACTED - NAME OF A TWL LAWYER]

From: WRowan <[REDACTED]>
Date: Friday, April 21, 2023 at 2:00 AM
To: [REDACTED - A TWL LAWYER]
Cc: Adrian Haro <[REDACTED]>
Subject: Re: TWL/MM4A - framework for continuing working relationship
[REDACTED - NAME OF A TWL LAWYER],

As I have made clear throughout this fraught dialogue, we are willing – indeed keen – to continue the design sprint. My problem is that we are trying to plan a complex, multi-dependency, multi-stakeholder, technology and implementation operation across two countries in a fog of inconclusive information with deadlines for major decisions now on top of us. Your email hasn't helped:

- **It is contradictory:** Point 1 says TWL is “willing and intends to continue” the design sprint to end of 2023. Point 2 says TWL directors are meeting next week to decide “whether TWL should continue with its work on the design sprint”. Which of these statements should be the basis for our planning right now?
- **Lack of timeline:** As I explained, I don't need to know when internal meetings are happening. I need to know when I will next get an actionable datapoint, even if imperfect. How quickly will decisions made next Friday be communicated to me? I have asked for an email later that day so we can use early-Monday meetings to accelerate/decelerate wind-down of the project in line with sentiment from TWL. Can you confirm this will be forthcoming please.

Your Point 2, below, has further undermined the last two meetings and email follow-ups between us (which asserted TWL's commitment to the design sprint through end of the year). Please communicate to directors the extreme precariousness this project is now in. If statements made by you and Adrian over the last few weeks are to be again weakened, or reversed, at the end of next week, we at this end will have to move fast to communicate what has happened.

I remain keen to remove any hint of pressure or brinkmanship from these deliberations. Please relay a repeat of my suggestion that if directors want time to think or discuss, they could release the May disbursement on schedule (assuming it hasn't already been spent on lawyers' fees) which would give everyone a couple of weeks' breathing space to discuss a mutually beneficial way forward.

I emailed [REDACTED - ANOTHER TWL LAWYER] directly after our call, as I said I would.

Wingham

From: [REDACTED - A TWL LAWYER]
Date: Thursday, April 27, 2023 at 09:18
To: WRowan <[REDACTED]>
Subject: RE: [EXT] Re: TWL/MM4A - framework for continuing working relationship

Wingham,

Our prior communications were very clear and I don't think your email below is constructive. Nevertheless, please see my responses in-line below.

Regards,
[REDACTED - NAME OF A TWL LAWYER]

- **It is contradictory:** Point 1 says TWL is "willing and intends to continue" the design sprint to end of 2023. Point 2 says TWL directors are meeting next week to decide "whether TWL should continue with its work on the design sprint". **Which of these statements should be the basis for our planning right now?** **[[REDACTED - LAWYER INITIALS]: My email is not contradictory. We have been very clear that at this time TWL is willing to continue with work on the design sprint in accordance with the terms we have outlined in prior discussions, email communications, and Adrian's memo. However, we have been equally clear that the board will be meeting to discuss your complaint, the status of the design sprint, and the framework for moving forward, if at all. Ultimately, the board's decisions will govern.]**

- **Lack of timeline:** As I explained, I don't need to know when internal meetings are happening. I need to know when I will next get an actionable datapoint, even if imperfect. How quickly will decisions made next Friday be communicated to me? I have asked for an email later that day so we can use early-Monday meetings to accelerate/decelerate wind-down of the project in line with sentiment from TWL. **Can you confirm this will be forthcoming please. [[REDACTED - LAWYER INITIALS]: Consistent with our last discussion and my follow-up email, as soon as reasonably possible after the board meets tomorrow afternoon, and based on guidance from the board, we will reach out to you regarding status and next steps.]**

Your Point 2, below, has further undermined the last two meetings and email follow-ups between us (which asserted TWL's commitment to the design sprint through end of the year). Please communicate to directors the extreme precariousness this project is now in. If statements made by you and Adrian over the last few weeks are to be again weakened, or reversed, at the end of next week, we at this end will have to move fast to communicate what has happened. **[[REDACTED - LAWYER INITIALS]: Out statements have been consistent over the course of our discussions and email communications. The fact that you continue to ask for terms and assurances to which TWL is unable to commit at this time does not "weaken" or "reverse" TWL's position.]**

I remain keen to remove any hint of pressure or brinkmanship from these deliberations. Please relay a repeat of my suggestion that if directors want time to think or discuss, they could release the May disbursement on schedule (assuming it hasn't already been spent on lawyers' fees) which would give everyone a couple of weeks' breathing space to discuss a mutually beneficial way forward. **[[REDACTED - LAWYER INITIALS]: Your request regarding the May disbursement has been noted. Your continuing remarks regarding "lawyers' fees" and suggestions regarding TWL's decision-making process and the manner in which it runs its operations are not constructive.]**