

# Compilation of Exemplar Logs



### **Exemplar A - Traditional Privilege Log**

<b>PRIV ID</b>	<b>Beg Bates</b>	<b>End Bates</b>	<b>From / Author</b>	<b>To</b>	<b>CC</b>	<b>Additional Communicants / Legal Involvement</b>	<b>Date</b>	<b>Privilege Basis</b>	<b>Privilege Description</b>	<b>Filename / Subject</b>
1	16021	16022	Jack Horne	Ron Derek; Jeff Oswald	Scott Sampson	ACME Legal Department	10/24/2017	ACP	Memo prepared and circulated between non-attorneys reflecting confidential legal advice of in-house Legal Department regarding changes to CCR Rule.	Analysis of CCR Rule Changes (10-24-2017).docx
2	16244	16244	Jack Horne	Andrea Stuart		Monica Bauer*	10/26/2017	ACP	Email chain between non-attorneys reflecting request for confidential legal advice by in-house counsel M. Bauer re: legal environmental issues at Baxter landfill site, and attachment regarding the same.	RE: Changes at Baxter Landfill
3	16245	16250	Jack Horne	Andrea Stuart		Monica Bauer*	10/26/2017	ACP	Memo prepared and circulated between non-attorneys reflecting confidential legal advice of in-house counsel M. Bauer re: legal environmental issues at Baxter landfill site.	Baxter Landfill CCR Plan.docx
4	17230	17231	Paul Prince	Michael Washington; Bob Eckstein*			11/3/2017	ACP	Email chain between outside counsel B. Eckstein and clients providing information to enable the rendering of legal advice re: response to regulator about Baxter landfill, and reflecting legal advice re: the same.	RE: Follow up from EPA visit.msg

5	18356	18358	Paul Prince	Andrea Stuart; Bob Eckstein*	Ron Derek		1/3/2018	ACP/WP	Email chain between outside counsel B. Eckstein and clients discussing results of sampling conducted pursuant to pending litigation procedures, prepared in connection with ongoing litigation.	FW: Baxter Groundwater Sample.msg
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**Exemplar B –Categorical Privilege Log**

Category No.	Date Range <sup>1</sup>	Document Type	Sender(s)/Recipient(s)/Copyee(s)	Category Description	Privilege Justification	Documents Withheld (Total Documents: 454) <sup>2</sup>	Documents Withheld, Including Families <sup>3</sup>
1	3/11/2012 - 6/30/2012	Email, PDF	<b>Attorneys:</b> K. Currie, Esq.; S. Salem, Esq.; E. Mendola, Esq.; F. Fernandez, Esq.; J. Driscoll, Esq.; T. Duxbury, Esq (Smith and Kline LLP); K. Currie, Esq. <b>Client:</b> M. Salem; K. O'Shea; J. Martin; C. Dew; F. Zeigler; M. Moore; E. Andrews; A. Skar; A. Chen; J. Ginter; F. Treglia; B. Parks; R. Thomas; V. Anderson; H. Dickey; C. Vega; M. McIntosh; B. Carrol; E. Schmidt; B. Newburn; S. Turner; J. Rose; C. Whalen; C. Acton; D. Holmes; K. Stewart; J. Ginter; F. Treglia <b>Qualified Third-Parties:</b> H. Smith (Accountants LLP), D. Jones (Consultant)	Communications with outside counsel providing, requesting or reflecting legal advice regarding easement and operating agreement negotiations with Heights Building Ltd.	Attorney-Client Privilege; Attorney Work Product	325	415
2	3/11/2012 - 5/31/2012	Email, Powerpoint, PDF	<b>Attorneys:</b> K. Currie, Esq.; S. Salem, Esq.; E. Mendola, Esq.; F. Fernandez, Esq.; J. Driscoll, Esq.; T. Duxbury, Esq (Smith and Kline LLP); K. Currie, Esq. <b>Client:</b> M. Salem; K. O'Shea; J. Martin; C. Dew; F. Zeigler; M. Moore; E. Andrews; A. Skar; A. Chen; J. Ginter; F. Treglia; B. Parks; R. Thomas; V. Anderson; H. Dickey; C. Vega; M. McIntosh; B. Carrol; E. Schmidt; B. Newburn; S. Turner; J. Rose; C. Whalen; C. Acton; D. Holmes; K. Stewart; J. Ginter; F. Treglia	Communications with in-house counsel providing, requesting or reflecting legal advice regarding third-party claims related to Montague construction.	Attorney-Client Privilege; Attorney Work Product	45	52
3	3/11/2012 - 6/30/2012	Email, PDF	J. Ginter; F. Treglia; K.; A. Adams.; K. O'Shea; J. Martin; C. Dew; F. Zeigler; M. Moore; E. Andrews; M. Salem; A. Skar; A. Chen; B. Parks; R. Thomas; V. Anderson; H. Dickey; C. Vega; M. McIntosh; B. Carrol; E. Schmidt; B. Newburn; S. Turner; J. Rose; C. Whalen	Communications between non-lawyers containing information prepared by or on behalf of an attorney in preparation of litigation regarding Montague construction contracts.	Attorney Work Product	68	82

1. Parties will agree on the relevant date range for discovery in the litigation. Date ranges in the log are a subset of this range and reflect the date of the earliest document and the date of the last document in the category.

2. Documents may appear in more than one category. Total Document represents the total document count.

3. Documents Withheld represents the number of documents to which privilege applies in each category; Documents Withheld, Including Families includes these documents with families, which may not be privileged.

### **Exemplar C - Metadata Privilege Log**

Priv ID	Beg Bates	End Bates	Custodian	From/Author	To	CC	Date	Privilege Basis	Subject / Filename
1	18019	18019	Ted Alden	talden@acme.com	ksmoot@acme.com	Rlawyer@lawfirm.com	4/4/2019	ACP	Letter to Acme (4-4-2019 draft).doc
2	18037	18037	Ted Alden	Rlawyer@lawfirm.com	talden@acme.com		5/9/2019	ACP	Response to Your Offer.doc
3	18276	18276	Bob Franks	talden@acme.com	bfranks@acme.com		5/11/2019	ACP	FW: Response to Your Offer.doc
4	18332	18332	Ted Alden	Rlawyer@lawfirm.com	talden@acme.com; ksmoot@acme.com		7/31/2019	ACP / WP	Complaint Outline (7/29/2019 draft)
5	18415	18415	Karen Smoot	talden@acme.com	Rlawyer@lawfirm.com	ksmoot@acme.com	9/2/2019	ACP / WP	RE: counterclaim considerations

**Metadata Privilege Log with Name Normalization and Identification of Legal Names**

Priv ID	Beg Bates	End Bates	Custodian	From/Author	To	CC	Date	Privilege Basis	Subject / Filename
1	18019	18019	Ted Alden	Ted Alden	Karen Smoot	Ron Lawyer*	4/4/2019	ACP	Letter to Acme (4-4-2019 draft).doc
2	18037	18037	Ted Alden	Ron Lawyer*	Ted Alden		5/9/2019	ACP	Response to Your Offer.doc
3	18276	18276	Bob Franks	Ted Alden	Bob Franks		5/11/2019	ACP	FW: Response to Your Offer.doc
4	18332	18332	Ted Alden	Ron Lawyer*	Ted Alden; Karen Smoot		7/31/2019	ACP / WP	Complaint Outline (7/29/2019 draft)
5	18415	18415	Karen Smoot	Ted Alden	Ron Lawyer*	Karen Smoot	9/2/2019	ACP / WP	RE: counterclaim considerations

**Exemplar D - Metadata PLUS Topic Privilege Log (Metadata plus Subject Matter / Topic / Privilege Category field)**

Priv Log #	Subject/Filename	Date/Time	Privilege	Custodian	Author/From	To	CC	Add'l Legal Communication Participants	Privilege Category
PRIV-0001	FW: Request for Payment of Joint Defense Costs (August 2007)	3/11/2012	ACP; WP; JD	George Toscana	Michael T. Smith (K&S)	Don O'Shea (Alston)	George Toscana		Lawyer Billing/Invoices
PRIV-0002	Maryland depo prep	1/7/2013	ACP; WP	George Toscana	George Toscana	Michael T. Smith (K&S)			Deposition Preparation and Strategy
PRIV-0003	Maine Depo	3/18/2013	ACP; WP	George Toscana	George Toscana	Michael T. Smith (K&S)			Deposition Preparation and Strategy
PRIV-0004	Preparation Notes.pdf	3/20/2013	ACP; WP	George Toscana	George Toscana	Michael T. Smith (K&S)	Don O'Shea (Alston)		Discovery Response Preparation and Strategy
PRIV-0005	RE: ACME Engineering	6/16/2014	ACP; WP	George Toscana	Derek Grifols	George Toscana		Michael T. Smith (K&S)	Draft Dispute Correspondence
PRIV-0006	Lawson Case.doc	9/15/2017	ACP; WP	George Toscana	Mary House (Alston)	George Toscana; Michael T. Smith (K&S)	Don O'Shea (Alston); Jack Mister (Alston)		Settlement Analysis / Dispute Resolution Strategy
PRIV-0007	Lawson Case Analysis.pdf	9/15/2017	ACP; WP	George Toscana	Mary House (Alston)	George Toscana; Michael T. Smith (K&S)	Don O'Shea (Alston); Jack Mister (Alston)		Settlement Analysis / Dispute Resolution Strategy
PRIV-0008	Opinion Memo on ACME 12.2.20.pdf	12/2/2020	ACP; WP	George Toscana	Derek Grifols	Jack Mister (Alston); Mary House (Alston)			Litigation Strategy / Trial Prep