

Compilation of Exemplar Privilege Logs

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Exemplar A - Traditional Privilege Log

PRIV ID	Beg Bates	End Bates	From / Author	To	CC	Additional Communicants / Legal Involvement	Date	Privilege Basis	Privilege Description	Filename / Subject
1	16021	16022	Jack Horst	Dave Raust; Scott Smoot	Andi Rogers	ACME Legal Department	2018-04-25	ACP	Memo between non-attorneys reflecting confidential legal advice re: analysis of and implementation of EPA regulation	EPA New Regs – DRAFT White Paper (4-25-2018)
2	16244	16244	Jack Horst	Monica Brown*			2018-05-20	ACP	Email from client to attorney requesting confidential legal advice re: landfill inspection issues	Landfill inspection assessment
3	16245	16250	Jack Horst	Andi Rogers		Monica Brown*	2018-05-24	ACP	Email chain between attorney and clients providing information to enable the rendering of legal advice re: Corrective Action Plan	FW: Corrective Action Plan
4	17230	17231	Monica Brown*	Dave Raust	Andi Rogers, Scott Smoot		2018-06-02	ACP	Email between attorney and client providing confidential legal advice regarding response to regulator re: groundwater inspections	Discuss response to DEQ
5	18356	18358	Monica Brown*	Monica Brown*			2018-06-20	ACP/WP	Notes prepared by attorney reflecting mental impressions and legal strategy in connection with pending litigation	Response to Plaintiff's letter.docx

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Exemplar B –Categorical Privilege Log

Category No.	Date Range ¹	Document Type	Sender(s)/Recipient(s)/Copyee(s)	Category Description	Privilege Justification	Documents Withheld (Total Documents: 454) ²	Documents Withheld, Including Families ³
1	3/11/2012 - 6/30/2012	Email, PDF	Attorneys: 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. Client: 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 Qualified Third-Parties: 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	Attorneys: 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. Client: 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

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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

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									(7/29/2019 draft)
5	18415	18415	Karen Smoot	Ted Alden	Ron Lawyer*	Karen Smoot	9/2/2019	ACP / WP	RE: counterclaim considerations

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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 2014)	10/5/2014	ACP; WP; JD	George Toscana	Michael T. Smith (K&S)	Don O'Shea (Alston); Jack Mister (Alston)	George Toscana		Lawyer Billing/Invoices
PRIV-0002	Oregon Depo	11/16/2014	ACP; WP	George Toscana	George Toscana	Michael T. Smith (K&S)			Deposition Preparation and Strategy
PRIV-0003	RE: New Jersey Depo Outline	12/1/2014	ACP; WP	George Toscana	George Toscana	Michael T. Smith (K&S)			Deposition Preparation and Strategy
PRIV-0004	Preparation Notes.pdf	12/16/2014	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	6/6/2015	ACP; WP	George Toscana	Sandy Pond	George Toscana		Michael T. Smith (K&S)	Settlement Analysis / Dispute Resolution Strategy
PRIV-0006	FW: Laxton Case Assessment	7/13/2015	ACP; WP	George Toscana	Mary House (Alston)	George Toscana; Michael T. Smith (K&S)	Don O'Shea (Alston); Jack Mister (Alston); Torrance Shorn (Alston)		Settlement Analysis / Dispute Resolution Strategy
PRIV-0007	Laxton Case Assessment.docx	7/13/2015	ACP; WP	George Toscana	Mary House (Alston)	George Toscana; Michael T. Smith (K&S)	Don O'Shea (Alston); Jack Mister (Alston); Torrance Shorn (Alston)		Settlement Analysis / Dispute Resolution Strategy
PRIV-0008	Opinion Memo on ACME 9.05.2015.pdf	9/6/2015	ACP; WP	George Toscana	Derek Grifols	Jack Mister (Alston); Mary House (Alston)			Litigation Strategy / Trial Prep