

No.	Document Type	Date	Author(s)	Recipient(s)	Subject	Pages	Privilege
1	Correspondence	10/14/2004	Judy Barone (local counsel)	Rena Lindevaldsen	Facsimile letter between counsel discussing strategy, research, and impression for legal briefing in Miller/Jenkins Vermont litigation	5	Work Product
2	Notes/Research/ Strategy/Impressions	Undated	Rena Lindevaldsen	n/a	Legal research on Vermont statutes and caselaw for Miller/Jenkins Vermont litigation; research on appeals, contempt issues, and other attorney thoughts and impressions concerning pleadings in Vermont custody litigation	100	Work Product
3	Correspondence	9/20/2004	Judy Barone	Rena Lindevaldsen	Facsimile letter between counsel discussing strategy, research, and impression for legal briefing in Miller/Jenkins Vermont litigation (discussing pro hac vice applications and supplemental briefing matters on custody issues)	10	Work Product
4	Correspondence	9/29/2004	Rena Lindevaldsen	Judy Barone, Peter Hanson (local counsel)	Facsimile letter between counsel discussing strategy, research, and impression for legal briefing in Miller/Jenkins Vermont litigation	3	Work Product
5	Correspondence	10/14/2004	Judy Barone	Rena Lindevaldsen	Facsimile letter between counsel discussing strategy, research, and impression for legal briefing in Miller/Jenkins Vermont litigation	5	Work Product
6	Notes/Research/ Strategy/Impressions	Undated	Rena Lindevaldsen, Judy Barone	n/a	Vermont caselaw, statutes, and misc. research concerning attorney thoughts, impressions, highlights, notes, and comments for Miller/Jenkins custody litigation in Vermont	40	Work Product
7	Correspondence	10/20/2004	Judy Barone	Rena Lindevaldsen	Facsimile letter between counsel discussing strategy, research, and impression for legal briefing on Uniform Parentage Act in Miller/Jenkins Vermont litigation	17	Work Product
8	Research/Notes/ Strategy	Undated	Rena Lindevaldsen, David Corry (former LC ¹ atty)	n/a	Vermont caselaw, statutes, and misc. research concerning attorney thoughts, impressions, highlights, notes, and comments for Miller/Jenkins custody litigation in Vermont	72	Work Product
9	Research/Notes/ Strategy	Undated	Rena Lindevaldsen, David Corry	n/a	Vermont caselaw, statutes, and misc. research concerning attorney thoughts, impressions, highlights, notes, and comments for upcoming briefing in Miller/Jenkins custody litigation in Vermont	158	Work Product
10	Notes/Research/ Strategy/Impressions	Undated	David Corry	n/a	Vermont caselaw, statutes, and misc. research concerning attorney thoughts, impressions, highlights, notes, and comments for Miller/Jenkins custody litigation in Vermont	210	Work Product
11	Notes/Research/ Strategy/Impressions	Undated	Rena Lindevaldsen	n/a	Vermont caselaw, statutes, and misc. research concerning attorney thoughts, impressions, highlights, notes, and comments for Miller/Jenkins custody litigation in Vermont	85	Work Product
12	Correspondence	1/25/2005	Kevin Blier (consulting local atty)	Rena Lindevaldsen	Electronic mail communication with letter between counsel discussing strategy, research, and impression for legal briefing in Miller/Jenkins Vermont litigation	5	Work Product
13	Notes/Research/ Strategy/Impressions	Undated	David Corry		Attorney notes, thought, impressions and argument outline for oral argument in Miller/Jenkins litigation in Vermont	76	Work Product

No.	Document Type	Date	Author(s)	Recipient(s)	Subject	Pages	Privilege
14	Notes/Research/ Strategy/Impressions	Undated	Rena Lindevaldsen	n/a	Attorney notes, thoughts, comments, highlights, and impressions concerning transcript of 8/24/2005 hearing in Miller/Jenkins custody litigation in Vermont on withdrawing waiver of parentage challenge	155	Work Product
15	Notes/Research/ Strategy/Impressions	Undated	Rena Lindevaldsen	n/a	Attorney notes, thoughts, comments, highlights, and impressions concerning transcript of 8/17/2004 hearing in Miller/Jenkins custody litigation in Vermont on motion for contempt	180	Work Product
16	Notes/Research/ Strategy/Impressions	Undated	David Corry	n/a	Attorney notes, thoughts, comments, highlights, and impressions concerning transcript of 5/26/2004 hearing in Miller/Jenkins custody litigation in Vermont on request for temporary custody order	127	Work Product
17	Notes/Research/ Strategy/Impressions	Undated	Rena Lindevaldsen	n/a	Attorney notes, thoughts, comments, highlights, and impressions concerning transcript of 3/15/2004 hearing in Miller/Jenkins custody litigation in Vermont on contested divorce	132	Work Product
18	Notes/Research/ Strategy/Impressions	Undated	Rena Lindevaldsen	n/a	Attorney notes, thoughts, comments, highlights, and impressions concerning transcript of 3/15/2004 hearing in Miller/Jenkins custody litigation in Vermont on contested divorce	126	Work Product
19	Notes/Research/ Strategy/Impressions	Undated	Rena Lindevaldsen	n/a	Attorney notes, thoughts, comments, highlights, and impressions concerning transcript of 5/26/2004 hearing in Miller/Jenkins custody litigation in Vermont on temporary custody	71	Work Product
20	Notes/Research/ Strategy/Impressions	Undated	David Corry	n/a	Vermont caselaw, statutes, and misc. research concerning attorney thoughts, impressions, highlights, notes, and comments for Miller/Jenkins custody litigation in Vermont	53	Work Product
21	Notes/Research/ Strategy/Impressions	Undated	David Corry	n/a	Vermont caselaw, statutes, and misc. research concerning attorney thoughts, impressions, highlights, notes, and comments for Miller/Jenkins custody litigation in Vermont	21	Work Product
22	Notes/Research/ Strategy/Impressions	Undated	Former LC legal intern Johnson	David Corry, Erik Stanley (former LC atty), Rena Lindevaldsen	Legal research memorandum with attorney highlights, comments, thoughts, and impressions concerning full faith and credit arguments in Miller/Jenkins custody litigation in Vermont	108	Work Product
23	Notes/Research/ Strategy/Impressions	Undated	Rena Lindevaldsen	n/a	Vermont caselaw, statutes, and misc. research concerning attorney thoughts, impressions, highlights, notes, and comments re scientific studies on same-sex parents for Miller/Jenkins custody litigation in Vermont	9	Work Product
24	Notes/Research/ Strategy/Impressions	Undated	Former LC legal intern Curtis	Rena Lindevaldsen, Erik Stanley	Legal research memorandum with attorney highlights, comments, thoughts, and impressions concerning potential federal claims and arguments in Miller/Jenkins custody litigation in Vermont	20	Work Product

No.	Document Type	Date	Author(s)	Recipient(s)	Subject	Pages	Privilege
25	Notes/Research/ Strategy/Impressions	Undated	Matthew Krause (former LC atty)	David Corry	Legal research memorandum with attorney highlights, comments, thoughts, and impressions concerning potential arguments concerning witness testimony in Miller/Jenkins custody litigation in Vermont	14	Work Product
26	Correspondence	4/5/2007	Mathew Krause	David Corry	Legal research e-mail memorandum with attorney highlights, comments, thoughts, and impressions concerning potential arguments in Miller/Jenkins custody litigation in Vermont	3	Work Product
27	Notes/Research/ Strategy/Impressions	Undated	Former LC legal intern Davies	David Corry	Legal research memorandum with attorney highlights, comments, thoughts, and impressions concerning potential arguments in Miller/Jenkins custody litigation in Vermont	3	Work Product
28	Notes/Research/ Strategy/Impressions	Undated	David Corry	n/a	Vermont caselaw, statutes, and misc. research containing attorney thoughts, impressions, highlights, notes, and comments for Miller/Jenkins custody litigation in Vermont re custody	1 AF ²	Work Product
29	Notes/Research/ Strategy/Impressions	Undated	Former LC legal intern Curtis	David Corry	Legal research memorandum with attorney highlights, comments, thoughts, and impressions concerning potential arguments concerning witness testimony in Miller/Jenkins custody litigation in Vermont	3	Work Product
30	Notes/Research/ Strategy/Impressions	Undated	Rena Lindevaldsen	n/a	Vermont caselaw, statutes, and misc. research containing attorney thoughts, impressions, highlights, notes, and comments for Miller/Jenkins custody litigation in Vermont	1 AF	Work Product
31	Correspondence	4/22/2009	Bonnie Gentry (former LC legal asst)	Norm Smith (local counsel), Stephen Crampton (former LC atty)	Attorney research, notes, comments, discussion, and strategy re pleadings and briefings in Vermont trial court and misc issues related to Lisa Miller previous attorney	13	Work Product
32	Notes/Research/ Strategy/Impressions	Undated	Rena Lindevaldsen	n/a	Attorney research, notes, comments, discussion, and strategy re pleadings and briefings in Vermont trial court	0.5 AF	Work Product
33	Notes/Research/ Strategy/Impressions	Undated	Rena Lindevaldsen, Norman Smith	n/a	Attorney research, notes, comments, discussion, and strategy re pleadings and briefings in Vermont trial court	0.5 AF	Work Product
34	Notes/Research/ Strategy/Impressions	April 2007	Rena Lindevaldsen	n/a	Attorney research, notes, comments, discussion, and strategy re pleadings and briefings in Vermont trial court	0.5 AF	Work Product
35	Correspondence	10/25/2004	Judy Barone	Rena Lindevaldsen	Facsimile letter between counsel discussing strategy, research, and impression for legal briefing in Miller/Jenkins Vermont litigation	19	Work Product
36	Correspondence	1/25/2008	Stephen Crampton	Belinda Wetherington (former LC legal asst)	Email correspondence from counsel to paralegal regarding motion to dismiss appeal with notes, comments, thoughts, and discussion of strategy	3	Work Product
37	Correspondence	12/21/2007	Belinda Wetherington	Stephen Crampton, Rena Lindevaldsen, Mathew Staver	Email correspondence from legal staff to counsel memorializing instructions concerning motion to dismiss appeal with notes, comments, thoughts, and discussion of strategy	2	Work Product

No.	Document Type	Date	Author(s)	Recipient(s)	Subject	Pages	Privilege
38	Correspondence	12/21/2007	David Corry	Belinda Wetherington	Email correspondence from counsel to paralegal providing instructions for finalizing motion to dismiss appeal and motions for pro hac vice issues with notes, comments, thoughts, and discussion of strategy	4	Work Product
39	Notes/Research/ Strategy/Impressions	5/8/2009	Rena Lindevaldsen	n/a	Attorney research, notes, comments, discussion, and strategy re hearing in Vermont trial court	0.5 AF	Work Product
40	Notes/Research/ Strategy/Impressions	Undated	Rena Lindevaldsen	n/a	Attorney research, notes, comments, discussion, and strategy re briefs at the Court of Appeals of Virginia re registration action in Virginia	158	Work Product
41	Notes/Research/ Strategy/Impressions	Undated	Rena Lindevaldsen	n/a	Attorney research, notes, comments, discussion, strategy, and oral argument outlines for argument at the Court of Appeals of Virginia	0.5 AF	Work Product
42	Correspondence	2/16/2010	Rena Lindevaldsen	Mathew Staver, Stephen Crampton, Mary McAlister, Bonnie Gentry	Email correspondence among counsel discussing subpoena issues and strategy and documentation for upcoming hearing	8	Work Product
43	Correspondence	2/26/2010	Stephen Crampton	Mathew Staver, William McRorie (consulting counsel), Rena Lindevaldsen	Email correspondence concerning discovery issues and strategy and discussion concerning response to same	8	Work Product
44	Notes/Research/ Strategy/Impressions	Undated	Rena Lindevaldsen	n/a	Attorney research, notes, comments, discussion, strategy, and argument impressions for motion to stay enforcement pending appeal in Virginia Trial Court parentage action	142	Work Product
45	Notes/Research/ Strategy/Impressions	Undated	Rena Lindevaldsen	n/a	Attorney research, notes, comments, discussion, strategy, and argument impressions for briefing on registration appeal in Virginia Trial Court	139	Work Product
46	Notes/Research/ Strategy/Impressions	2/2007	Rena Lindevaldsen, Mathew Staver, Mary McAlister	n/a	Attorney research, notes, comments, discussion, strategy, and argument impressions for Petition for Writ of Certiorari to U.S. Supreme Court	1 AF	Work Product
47	Correspondence	12/15/2009	Norman Smith	Bonnie Gentry	Attorney email correspondence concerning logistics and filing of Docketing Statement for appeal to Vermont Supreme Court	2	Work Product
48	Notes/Research/ Strategy/Impressions	Undated	Rena Lindevaldsen, Mary McAlister	n/a	Attorney research, notes, comments, discussion, strategy, and argument impressions for Petition for Appeal to Virginia Supreme Court re registration action	0.5 AF	Work Product
49	Notes/Research/ Strategy/Impressions	Undated	Rena Lindevaldsen	n/s	Attorney research, notes, comments, discussion, strategy, and argument impressions for oral argument at Virginia Supreme Court, attorney oral argument outline for same	2 AF	Work Product
50	Correspondence	11/5/2007	Rena Lindevaldsen	Stephen Crampton, Belinda Wetherington	Attorney research, notes, comments, discussion, strategy, and argument impressions for Petition for Writ of Certiorari to U.S. Supreme Court	1 AF	Work Product

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51	Notes/Research/ Strategy/Impressions	Undated	Mathew Staver	n/a	Attorney thoughts, impressions, notes, comments, and edits on Petition for Writ of Certiorari to US Supreme Court	1 AF	Work Product
52	Notes/Research/ Strategy/Impressions	Undated	Rena Lindevaldsen	n/a	Attorney research, notes, comments, discussion, strategy, and argument impressions for oral argument at Virginia Court of Appeals, attorney oral argument outline for same	2 AF	Work Product
53	Notes/Research/ Strategy/Impressions	Undated	Rena Lindevaldsen	n/a	Attorney research, notes, comments, cases, thoughts, impressions, and strategy for pleadings in Virginia declaratory judgment action	158	Work Product
54	Notes/Research/ Strategy/Impressions	Undated	Rena Lindevaldsen	n/a	Attorney research, notes, comments, thoughts, impression, and oral argument preparation and outline for Vermont Supreme Court argument containing oral argument binder of relevant pleadings	1 AF	Work Product
55	Notes/Research/ Strategy/Impressions	Undated	Rena Lindevaldsen	n/a	Attorney research, notes, comments, thoughts, impression, and oral argument preparation and outline for Vermont trial court in custody litigation	2 AF	Work Product
56	Notes/Research/ Strategy/Impressions	2007	Rena Lindevaldsen	n/a	Attorney research, notes, comments, thoughts, impressions, pleadings binder, case law binder, and oral argument preparation and outline for Vermont Supreme Court argument containing oral argument binder of relevant pleadings and case law/research for same	2 AF	Work Product
57	Notes/Research/ Strategy/Impressions	Undated	Rena Lindevaldsen	n/a	Attorney research, statutes, caselaw, notes, comments, cases, thoughts, impressions, and strategy for pleadings in Vermont litigation	0.5 AF	Work Product
58	Notes/Research/ Strategy/Impressions	Undated	Rena Lindevaldsen	n/a	Attorney notes, highlighted pleadings, research, statutes, and working file for all Vermont and Virginia litigation and appeals, including <i>inter alia</i> registration action and parentage research	1 AF	Work Product
59	Notes/Research/ Strategy/Impressions	Undated	Mathew Staver	n/a	Attorney notes, highlighted pleadings, research, statutes, and working file for all Virginia litigation and appeals and oral argument preparation for Virginia appeals	2 AF	Work Product
60	Correspondence	10/11/2007	Rena Lindevaldsen	Stephen Crampton, Erik Stanley, Mathew Staver	Attorney impressions, thoughts, strategy, and discussion of fee dispute between Lisa Miller and former attorney in the Virginia in custody litigation in Virginia	6	Work Product
61	Notes/Research/ Strategy/Impressions	Undated	Rena Lindevaldsen	n/a	Attorney research, notes, thoughts, comments, impressions on matters concerning fee dispute between Lisa Miller and former attorney in custody litigation in Virginia	3 AF	Work Product
62	Notes/Research/ Strategy/Impression	Undated	David Corry	n/a	Attorney research, notes, comments, thoughts, impression, and trial preparation and outline for Vermont trial court in custody litigation	1 AF	Work Product
63	Notes/Research/ Strategy/Impression	4/2/2007– 4/5/2007	David Corry	n/a	Attorney handwritten trial notes, thoughts, comments, and strategy from trial in Vermont custody litigation for 4/2/2007-4/5/2007 trial	1 AF	Work Product

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64	Notes/Research/ Strategy/Impression	Undated	David Corry	n/a	Attorney highlights, notes, thoughts, impressions, comments, and strategy on Vermont Supreme Court briefs	0.5 AF	Work Product
65	Notes/Research/ Strategy/Impressions	Undated	Rena Lindevaldsen	n/a	Attorney notes, thoughts, comments, highlights, and impressions containing transcript of hearing in Miller/Jenkins custody litigation in Vermont	1 AF	Work Product
66	Notes/Research/ Strategy/Impressions	Undated	Rena Lindevaldsen	n/a	Attorney notes, thoughts, comments, highlights, and impressions concerning Printed Case for Vermont Supreme Court in Miller/Jenkins custody litigation	2 AF	Work Product
67	Unsigned Attorney Draft Pleadings	Undated	Rena Lindevaldsen	n/a	Attorney draft pleadings containing proposed final orders in Miller/Jenkins custody litigation in Vermont	0.5 AF	Work Product
68	Unsigned Attorney Correspondence	7/31/2007	David Corry	n/a	Draft attorney correspondence memorializing telephone conferral regarding witnesses at August 3, 2007 hearing in Miller/Jenkins custody litigation	6	Work Product
69	Unsigned Attorney Draft Pleadings	Undated	Rena Lindevaldsen	n/a	Attorney draft pleadings in Miller/Jenkins custody litigation in Vermont	0.5 AF	Work Product
70	Unsigned Attorney Draft Pleadings	Undated	Rena Lindevaldsen, Norman Smith	n/a	Attorney draft pleadings in Miller/Jenkins custody litigation in Vermont	1 AF	Work Product
71	Unsigned Attorney Draft Pleadings	Undated	Rena Lindevaldsen, Norman Smith	n/a	Attorney draft pleadings in Miller/Jenkins custody litigation in Vermont	0.5 AF	Work Product
72	Correspondence	10/30/2007– 10/31/2007	Rena Lindevaldsen, Stephen Crampton, Lisa Miller	Rena Lindevaldsen, Stephen Crampton, Lisa Miller	Email correspondence chain discussing upcoming visitation issues and providing legal advice and discussion concerning appeals in custody litigation	4	Attorney-Client
73	Correspondence	10/30/2007– 10/31/2007	Rena Lindevaldsen, Stephen Crampton, Lisa Miller	Rena Lindevaldsen, Stephen Crampton, Lisa Miller	Email correspondence chain discussing upcoming visitation issues and providing legal advice and discussion concerning appeals in custody litigation	3	Attorney-Client
74	Correspondence	8/7/2007– 8/8/2007	Rena Lindevaldsen, Stephen Crampton, Lisa Miller	Rena Lindevaldsen, Stephen Crampton, Lisa Miller	Email correspondence chain discussing visitation problems and communication issues surrounding custody litigation	2	Attorney-Client
75	Correspondence	8/8/2007	Lisa Miller	Rena Lindevaldsen, Stephen Crampton	Email correspondence chain discussing visitation problems and communication issues surrounding Vermont custody litigation	1	Attorney-Client
76	Correspondence	11/13/2007	Lisa Miller	Rena Lindevaldsen, Stephen Crampton	Email correspondence providing draft letter for legal review, advice and discussion	1	Attorney-Client
77	Correspondence	11/13/2007	Lisa Miller	Rena Lindevaldsen, Stephen Crampton	Email correspondence providing draft letter for legal review, advice and discussion	1	Attorney-Client
78	Correspondence	11/11/2007	Lisa Miller	Rena Lindevaldsen, Stephen Crampton	Email correspondence providing letter for legal review, advice, and discussion concerning visitation issues in custody litigation	1	Attorney-Client
79	Correspondence	11/11/2007	Lisa Miller	Rena Lindevaldsen, Stephen Crampton	Email correspondence requesting legal advice and providing instructions to counsel for representation in custody litigation	1	Attorney-Client

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80	Correspondence	11/14/2007– 11/15/2007	Lisa Miller, Stephen Crampton	Rena Lindevaldsen, Stephen Crampton, Lisa Miller	Email correspondence chain discussing legal issues regarding visitations and child welfare in ongoing custody litigation	4	Attorney-Client
81	Correspondence	11/15/2007	Lisa Miller	Rena Lindevaldsen, Stephen Crampton	Email correspondence requesting legal advice concerning welfare of child and concerning public messaging surrounding custody litigation	1	Attorney-Client
82	Correspondence	12/21/2007	Lisa Miller	Stephen Crampton	Email correspondence requesting advice and providing information and instructions to counsel regarding visitation issues in custody litigation	1	Attorney-Client
83	Correspondence	12/21/2007	Lisa Miller	Stephen Crampton	Email correspondence requesting advice and providing information and instructions to counsel regarding visitation issues in custody litigation	1	Attorney-Client
84	Correspondence	12/21/2007	Lisa Miller	Stephen Crampton	Email correspondence providing information and instructions to counsel regarding visitation issues in custody litigation	1	Attorney-Client
85	Correspondence	12/21/2007	Lisa Miller	Stephen Crampton	Email correspondence providing information and instructions to counsel regarding visitation issues in custody litigation	1	Attorney-Client
86	Correspondence	3/29/2008– 3/31/2008	Lisa Miller, Stephen Crampton	Lisa Miller, Rena Lindevaldsen, Stephen Crampton	Email correspondence providing information and instructions to counsel regarding visitation issues in custody litigation	3	Attorney-Client
87	Correspondence	4/15/2008	Lisa Miller	Rena Lindevaldsen, Stephen Crampton, David Corry, Mathew Staver	Email correspondence requesting legal advice concerning visitation problems and issues, and concerning potential hearings in custody litigation.	2	Attorney-Client
88	Correspondence	4/15/2008	Lisa Miller	Rena Lindevaldsen, Stephen Crampton, David Corry, Mathew Staver	Email correspondence requesting legal advice concerning visitation problems and issues, and concerning potential hearings in custody litigation.	2	Attorney-Client
89	Correspondence	5/4/2008	Lisa Miller	Rena Lindevaldsen, Stephen Crampton	Email correspondence providing information requested by counsel concerning past visitation issues and problems	1	Attorney-Client
90	Correspondence	6/12/2008– 6/13/2008	Lisa Miller, Stephen Crampton	Rena Lindevaldsen, Stephen Crampton, Mathew Staver, Lisa Miller	Email correspondence chain advising client of legal obligations regarding court-ordered visitation, requesting client intentions and instructions, and receiving same from client.	2	Attorney-Client
91	Correspondence	7/30/3008	Lisa Miller	Rena Lindevaldsen, Stephen Crampton	Email correspondence providing information requested by counsel concerning past visitation issues and problems, discussing court hearing, and providing instruction for further representation	2	Attorney-Client
92	Correspondence	10/16/2008– 10/17/2008	Rena Lindevaldsen, Stephen Crampton, Lisa Miller	Rena Lindevaldsen, Stephen Crampton, Lisa Miller	Email correspondence chain providing legal advice to client, and receiving information and instruction from client for representation in custody litigation.	5	Attorney-Client

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93	Correspondence	11/27/2008– 12/3/2008	Lisa Miller, Mathew Staver	Lisa Miller, Mathew Staver, Bonnie Gentry	Email correspondence chain requesting information and instruction from client regarding visitation issues, and providing advice to client regarding same.	7	Attorney-Client
94	Correspondence	12/1/2008– 12/3/2008	Lisa Miller, Mathew Staver	Lisa Miller, Mathew Staver, Rena Lindevaldsen, Stephen Crampton, Bonnie Gentry	Email correspondence chain receiving from client information requested by counsel for use in representing client in custody litigation	5	Attorney-Client
95	Correspondence	12/12/2008– 12/19/2008	Rena Lindevaldsen, Stephen Crampton, Lisa Miller	Lisa Miller, Mathew Staver, Rena Lindevaldsen, Stephen Crampton, Bonnie Gentry	Email correspondence chain discussing hearing in custody litigation, and discussing efforts to modify visitation schedule	5	Attorney-Client
96	Correspondence	1/19/2009	Rena Lindevaldsen	Lisa Miller, Stephen Crampton, Michelle Kenny (GAL/counsel for Isabella)	Email correspondence discussing issues occurring at visitation, client needs/interests and welfare of child	2	Attorney-Client and Work-Product
97	Correspondence	3/6/2009	Lisa Miller	Rena Lindevaldsen, Stephen Crampton	Email correspondence discussing issues surrounding visitation, and child wishes and welfare	1	Attorney-Client
98	Correspondence	3/11/2009– 3/12/2009	Lisa Miller	Rena Lindevaldsen, Stephen Crampton	Email correspondence chain providing information and instruction to counsel for representation at upcoming hearing in custody litigation	2	Attorney-Client
99	Correspondence	3/12/2009	Rena Lindevaldsen, Stephen Crampton	Rena Lindevaldsen, Stephen Crampton, Lisa Miller	Email correspondence chain discussing hearing in custody litigation	2	Attorney-Client
100	Correspondence	3/9/2009– 3/9/2009	Rena Lindevaldsen, Lisa Miller	Rena Lindevaldsen, Lisa Miller	Email correspondence chain requesting and receiving information from client for drafting court documents.	2	Attorney-Client
101	Correspondence	3/6/2009	Lisa Miller, Stephen Crampton	Lisa Miller, Rena Lindevaldsen, Stephen Crampton	Email correspondence discussing issues surrounding visitation, and child wishes and welfare	3	Attorney-Client
102	Correspondence	3/6/2009	Stephen Crampton, Lisa Miller	Lisa Miller, Stephen Crampton, Rena Lindevaldsen, Bonnie Gentry	Email correspondence chain requesting and receiving from client information necessary for motion practice and upcoming hearing.	3	Attorney-Client
103	Correspondence	3/17/2009– 3/20/2009	Rena Lindevaldsen, Lisa Miller, Stephen Crampton	Lisa Miller, Rena Lindevaldsen, Stephen Crampton, Bonnie Gentry	Email correspondence chain advising client of potential outcomes and requesting information and instruction from client	4	Attorney-Client
104	Correspondence	3/17/2009– 3/20/2009	Rena Lindevaldsen, Lisa Miller, Stephen Crampton	Lisa Miller, Rena Lindevaldsen, Stephen Crampton, Bonnie Gentry	Email correspondence chain further advising client of potential outcomes and requesting client intention and instructions.	4	Attorney-Client

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105	Correspondence	3/17/2009	Rena Lindevaldsen, Lisa Miller	Rena Lindevaldsen, Lisa Miller, Bonnie Gentry	Email correspondence chain further advising client of potential outcomes and requesting client intention and instructions.	3	Attorney-Client
106	Correspondence	4/8/2009	Lisa Miller, Stephen Crampton, Rena Lindevaldsen	Lisa Miller, Stephen Crampton, Rena Lindevaldsen	Email correspondence chain further advising client of potential outcomes and requesting client intention and instructions.	4	Attorney-Client
107	Correspondence	4/15/2009	Rena Lindevaldsen	Lisa Miller, Bonnie Gentry	Email correspondence chain requesting information from client necessary for responding to visitation issues	2	Attorney-Client
108	Correspondence	4/9/2009	Rena Lindevaldsen, Lisa Miller	Lisa Miller, Stephen Crampton, Rena Lindevaldsen, Bonnie Gentry	Email correspondence chain confirming client intentions and instructions, and advising client of potential outcomes and legal consequences of same.	2	Attorney-Client
109	Correspondence	4/9/2009	Rena Lindevaldsen, Lisa Miller	Lisa Miller, Rena Lindevaldsen, Stephen Crampton, Bonnie Gentry	Email correspondence chain confirming client intentions and instructions, advising client of potential outcomes and legal consequences of same, and receiving further instructions and questions from client	3	Attorney-Client
110	Correspondence	5/8/2009	Rena Lindevaldsen, Lisa Miller, Horatio Mihet	Lisa Miller, Rena Lindevaldsen, Horatio Mihet, Stephen Crampton, Bonnie Gentry	Email correspondence chain confirming information and instructions from client regarding visitation and confirming advice to client regarding potential outcomes and legal consequences of same	3	Attorney-Client
111	Correspondence	7/6/2007– 9/7/2007	Lisa Miller, Stephen Crampton, Rena Lindevaldsen	Lisa Miller, Stephen Crampton, Rena Lindevaldsen, Eric Stanley, Mathew Staver	Selected email correspondences between attorney and client in custody litigation, compiled for use in court documents and hearings	3	Attorney-Client Work-Product
112	Correspondence	9/22/2009	Rena Lindevaldsen	Lisa Miller	Attempted email correspondence with client to remind client of outstanding need for information and instruction regarding visitation that must be conveyed to opposing party in custody litigation.	1	Attorney-Client
113	Correspondence	12/30/2004	Rena Lindevaldsen	Lisa Miller	Letter correspondence transmitting contract of representation and discussing representation	3	Attorney-Client
114	Correspondence	9/28/2005	Rena Lindevaldsen	Lisa Miller	Letter correspondence transmitting document and information related to custody litigation	3	Attorney-Client
115	Correspondence	4/12/2007	Rena Lindevaldsen	n/a	Draft letter correspondence concerning visitation issues arising from Vermont custody litigation	3	Work-Product
116	Correspondence	10/30/2007– 10/31/2007	Lisa Miller, Rena Lindevaldsen, Stephen Crampton	Lisa Miller, Rena Lindevaldsen, Stephen Crampton	Email correspondence chain requesting client information and instruction regarding negotiation of visitation issues	4	Attorney-Client
117	Correspondence	10/31/2007	Lisa Miller	Rena Lindevaldsen, Stephen Crampton	Email correspondence chain discussing visitation issues, and requesting and receiving client instructions	3	Attorney-Client

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118	Correspondence	9/10/2007– 9/13/2007	Rena Lindevaldsen, Stephen Crampton, Stephen Cable (consulting investigator)	Rena Lindevaldsen, Stephen Crampton, Stephen Cable	Email correspondence chain discussing potential witnesses for custody litigation, and appeal status	3	Work-Product
119	Correspondence	9/19/2007	Stephen Crampton	Stephen Cable	Email correspondence discussing potential witness testimony in custody litigation	1	Work-Product
120	Correspondence	8/7/2007– 8/8/2007	Rena Lindevaldsen, Lisa Miller	Lisa Miller, Rena Lindevaldsen, Stephen Crampton	Email correspondence chain discussing information and documents needed for custody litigation	2	Attorney-Client
121	Correspondence	8/7/2007– 8/8/2007	Stephen Crampton, Lisa Miller	Lisa Miller, Stephen Crampton, Rena Lindevaldsen	Email correspondence chain requesting legal advice and discussion concerning visitation issues and child welfare	2	Attorney-Client
122	Correspondence	8/8/2007	Lisa Miller	Stephen Crampton Rena Lindevaldsen	Email correspondence providing counsel information regarding visitation issues and child welfare	1	Attorney-Client
123	Correspondence	11/13/2007	Lisa Miller	Stephen Crampton, Rena Lindevaldsen	Email correspondence providing draft letter to counsel for review	1	Attorney-Client
124	Correspondence	11/13/2007	Lisa Miller	Stephen Crampton, Rena Lindevaldsen	Email correspondence providing draft letter to counsel for review	1	Attorney-Client
125	Correspondence	11/11/2007	Lisa Miller	Rena Lindevaldsen, Stephen Crampton	Email correspondence providing draft letter to counsel for review	1	Attorney-Client
126	Correspondence	11/11/2007	Lisa Miller	Stephen Crampton, Rena Lindevaldsen	Email correspondence providing counsel with instructions for representation in custody litigation and requesting information and advice from counsel	1	Attorney-Client
127	Correspondence	11/19/2007	Tammy Canfield (friend of Lisa Miller)	Stephen Crampton	Email correspondence providing information and potential testimony regarding visitation issues and child welfare	1	Work-Product
128	Correspondence	12/21/2007	Lisa Miller	Stephen Crampton	Email correspondence providing information and instructions to counsel regarding visitation issues in custody litigation	1	Attorney-Client
129	Correspondence	3/29/2008– 3/31/2208	Lisa Miller, Stephen Crampton	Lisa Miller, Stephen Crampton, Rena Lindevaldsen	Email correspondence providing information and instructions to counsel regarding visitation issues in custody litigation	3	Attorney-Client
130	Correspondence	4/15/2008	Lisa Miller	Rena Lindevaldsen, Stephen Crampton, David Corry	Email correspondence requesting legal advice concerning visitation problems and issues, and concerning potential hearings in custody litigation.	2	Attorney-Client
131	Correspondence	4/15/2008	Lisa Miller	Rena Lindevaldsen, Stephen Crampton, David Corry	Email correspondence requesting legal advice concerning visitation problems and issues, and concerning potential hearings in custody litigation.	2	Attorney-Client
132	Correspondence	5/4/2008	Lisa Miller	Rena Lindevaldsen, Stephen Crampton	Email correspondence providing information requested by counsel concerning past visitation issues and problems	1	Attorney-Client

No.	Document Type	Date	Author(s)	Recipient(s)	Subject	Pages	Privilege
133	Correspondence	6/12/2008– 6/13/2008	Lisa Miller, Stephen Crampton	Lisa Miller, Stephen Crampton, Rena Lindevaldsen	Email correspondence chain advising client of legal obligations regarding court-ordered visitation, requesting client intentions and instructions, and receiving same from client.	2	Attorney-Client
134	Correspondence	7/30/3008	Lisa Miller	Rena Lindevaldsen, Stephen Crampton	Email correspondence providing information requested by counsel concerning past visitation issues and problems, discussing court hearing, and providing instruction for further representation	2	Attorney-Client
135	Correspondence	10/16/2008– 10/17/2008	Lisa Miller	Rena Lindevaldsen, Stephen Crampton	Email correspondence chain providing legal advice to client, and receiving information and instruction from client for representation in custody litigation.	5	Attorney-Client
136	Correspondence	11/27/2008– 12/03/2008	Lisa Miller, Mathew Staver	Mathew Staver, Lisa Miller, Bonnie Gentry	Email correspondence chain requesting information and instruction from client regarding visitation issues, and providing advice to client regarding same.	7	Attorney-Client
137	Correspondence	12/1/2008– 12/3/2008	Lisa Miller, Mathew Staver	Mathew Staver, Lisa Miller, Bonnie Gentry	Email correspondence chain receiving from client information requested by counsel for use in representing client in custody litigation	5	Attorney-Client
138	Correspondence	12/12/2008– 12/19/2008	Stephen Crampton, Lisa Miller, Rena Lindevaldsen	Lisa Miller, Rena Lindevaldsen, Stephen Crampton, Mathew Staver	Email correspondence chain discussing court hearing, visitation issues and schedule negotiations, and requesting and receiving client intentions and instructions regarding same	5	Attorney-Client
139	Correspondence	1/19/2009	Rena Lindevaldsen	Michelle Kenny, Lisa Miller, Stephen Crampton	Email correspondence discussing issues occurring at visitation, client needs/interests and welfare of child	2	Work-Product
140	Correspondence	3/6/2009	Lisa Miller	Rena Lindevaldsen, Stephen Crampton	Email correspondence discussing issues surrounding visitation, and child wishes and welfare	1	Attorney-Client
141	Correspondence	1/19/2010	Rena Lindevaldsen	Norman Smith	Draft letter transmitting to local counsel pleadings for filing in custody litigation	2	Work-Product
142	Correspondence	2/17/2010	Mary McAlister	Stephen Crampton, Rena Lindevaldsen, Mathew Staver, Anita Staver (LC atty), Bonnie Gentry	Email correspondence providing update, discussion, attorney thoughts and impressions, and other information concerning hearing in custody litigation	3	Work-Product
143	Correspondence	2/23/2010	Rena Lindevaldsen, Stephen Crampton	Rena Lindevaldsen, Stephen Crampton	Email correspondence chain discussing strategy for upcoming hearing, and discussing unsuccessful attempts to contact client	2	Work-Product

No.	Document Type	Date	Author(s)	Recipient(s)	Subject	Pages	Privilege
145	Correspondence	12/15/2016	Horatio Mihet	Judge William K. Sessions, Counsel of Record in current litigation	Attorney draft correspondence concerning Plaintiff's motion to lift stay and join additional defendants	3	Work-Product
146	Correspondence	5/6/2009	Rena Lindevaldsen	Lisa Miller, Stephen Crampton, Horatio Mihet, Mathew Staver	Email correspondence providing update on upcoming hearing and instructions to client regarding same	1	Attorney-Client
147	Correspondence	5/27/2009	Rena Lindevaldsen	Lisa Miller, Stephen Crampton, Horatio Mihet, Mathew Staver	Email correspondence forwarding and discussing documents filed in custody litigation	9	Attorney-Client Work-Product
148	Correspondence	10/30/2009– 12/1/2009	David Corry, Nina Hampton (LC client), Anthony Quaranta (former LC legal asst)	David Corry, Nina Hampton	Email correspondence chain discussing client information and documents needed for beginning legal representation and attorney advice in unrelated client matter in California	3	Attorney-Client, Work-Product
149	Correspondence	11/12/2009	David Corry	Dr. John Harper, Tom Hernandez, Rod Westfall, Roger Bonuchi, Michael Kelly, Stuart Bledsoe, David Obrzut, Eric Gault, Michelle Smith (school officials), Stephen Fox (LC client rep)	Draft of attorney demand letter and legal strategy, thoughts, and impressions for unrelated client matter in Illinois	7	Work-Product
150	Correspondence	11/20/2009– 12/2/2009	Michelle Kenny, Rena Lindevaldsen	Rena Lindevaldsen, Michelle Kenny, Stephen Crampton, Bonnie Gentry	Email correspondence chain discussing attempts to reach client.	1	Work-Product
151	Correspondence	8/12/2009– 9/21/2009	David Corry, Stephen Crampton, Richard Boyer (former LC intern)	Goran Hunjak (LC client), Stephen Crampton, Richard Boyer, Bonnie Gentry	Email correspondence chain requesting information from client concerning unrelated legal matter in Missouri	2	Attorney-Client, Work-Product

No.	Document Type	Date	Author(s)	Recipient(s)	Subject	Pages	Privilege
152	Correspondence	9/19/2009– 9/22/2009	Mathew Staver, Patricia Mauceri (LC client), David Corry	Patricia Mauceri, David Corry, Mathew Staver, Jeff Thorpe (former LC intern), Anthony Quaranta, Richard Boyer	Email correspondence chain requesting information from client concerning unrelated legal matter involving contract and conscience issues	4	Attorney-Client, Work-Product
153	Correspondence	9/19/2009– 10/7/2009	Mathew Staver, Patricia Mauceri	Patricia Mauceri, Mathew Staver, Richard Boyer, Anthony Quaranta	Email correspondence chain requesting information from client concerning unrelated legal matter involving contract and conscience issues	3	Attorney-Client, Work-Product
154	Correspondence	9/21/2009	Nina Hampton	n/a	Draft letter from client to school district provided to Liberty Counsel attorneys for review, thoughts, impressions, editing, and legal advice in unrelated client matter in California	1	Attorney-Client Work-Product
155	Correspondence	9/22/2009	Rena Lindevaldsen	Lisa Miller, Bonnie Gentry	Attempted email correspondence with client to remind client of outstanding need for information and instruction regarding visitation that must be conveyed to opposing party in custody litigation.	1	Attorney-Client
156	Correspondence	9/19/2009– 9/22/2009	Mathew Staver, Patricia Mauceri, David Corry	Patricia Mauceri, David Corry, Mathew Staver, Jeff Thorpe, Anthony Quaranta, Richard Boyer	Email correspondence chain requesting information from client concerning unrelated legal matter involving contract and conscience issues	4	Attorney-Client, Work-Product
157	Correspondence	9/22/2009 (and earlier dates in 9/2009)	David Corry, Jeff Thorpe, Mathew Staver, Sarah Spillar (former LC legal asst)	David Corry, Jeff Thorpe, Mathew Staver, Anthony Quaranta	Email correspondence chain discussing internal research, thoughts, impressions, strategy, and caselaw on unrelated client matter involving contract and conscience issues	2	Work-Product
158	Correspondence	9/22/2009	David Corry	Beth Russell (LC client)	Email correspondence to client providing attorney thoughts, impressions, research, and legal memorandum in unrelated legal matter involving equal access and literature distribution issues	1	Attorney-Client Work-Product
159	Correspondence	9/15/2009; 9/22/2009	Anthony Quaranta, David Corry	Anthony Quaranta, David Corry	Email correspondence chain from Liberty Counsel client intake personnel providing information for potential unrelated client matter involving equal access and literature distribution issues	2	Work-Product
160	Correspondence	5/4/2009	Rena Lindevaldsen	Horatio Mihet, Stephen Crampton, Erin Harre (former LC staff)	Email correspondence discussing strategy and arguments for upcoming hearing in custody litigation	2	Work-Product

No.	Document Type	Date	Author(s)	Recipient(s)	Subject	Pages	Privilege
161	Correspondence	6/23/2009	Stephen Crampton, Rena Lindevaldsen, David Corry	Rena Lindevaldsen, Stephen Crampton, Mathew Staver, Anita Staver, David Corry, Matthew Krause, Horatio Mihet, Mary McAlister	Email correspondence chain discussing decision from Virginia Court of Appeals in the custody litigation, discussing thoughts, impressions, strategy	3	Work-Product
162	Correspondence	5/6/2009	Rena Lindevaldsen	Horatio Mihet	Email correspondence providing pleading in Vermont custody litigation and discussing same	2	Work-Product
163	Correspondence	5/6/2009	Stephen Crampton, Mathew Staver	Rena Lindevaldsen, Stephen Crampton, Horatio Mihet, Mathew Staver	Email correspondence chain discussing strategy for upcoming hearing in custody litigation	2	Work-Product
164	Correspondence	5/6/2009	Stephen Crampton, Rena Lindevaldsen	Rena Lindevaldsen, Stephen Crampton, Mathew Staver, Horatio Mihet	Email correspondence chain discussing strategy for upcoming hearing in custody litigation	2	Work-Product
165	Correspondence	5/6/2009	Rena Lindevaldsen, Horatio Mihet	Rena Lindevaldsen, Stephen Crampton, Mathew Staver, Horatio Mihet	Email correspondence chain discussing strategy for upcoming hearing in custody litigation	7	Work-Product
166	Correspondence	5/6/2009	Bonnie Gentry	Norman Smith, Rena Lindevaldsen, Stephen Crampton, Horatio Mihet	Email correspondence providing draft motions in Vermont custody litigation and discussing procedure and strategy for filing same	4	Work-Product
167	Correspondence	3/13/2009	Bonnie Gentry	Horatio Mihet	Email correspondence providing legal documents and pleadings for preparation in custody litigation	51	Work-Product
168	Correspondence	1/5/2010	Bonnie Gentry	Horatio Mihet, Stephen Crampton, Mathew Staver, Rena Lindevaldsen, David Corry, Mary McAlister	Email correspondence to legal team providing pleadings filed in custody litigation	11	Work-Product
169	Correspondence	9/4/2009	Rena Lindevaldsen, Bonnie Gentry	Anita Staver, Mathew Staver, Stephen Crampton, Mary McAlister, David Corry, Matthew Krause, Horatio Mihet	Email correspondence providing update on order issued in custody litigation	1	Work-Product
170	Correspondence	5/1/2009	Bonnie Gentry	Horatio Mihet	Email correspondence providing instructions and internal strategy for pleadings being filed in custody litigation	1	Work-Product

No.	Document Type	Date	Author(s)	Recipient(s)	Subject	Pages	Privilege
171	Correspondence	11/20/2009	Janie Tedeschi (LC staff)	Horatio Mihet, Bonnie Gentry	Email correspondence chain providing information concerning unrelated litigation matter for Liberty Counsel client in Florida litigation	3	Work-Product
172	Correspondence	11/20/2009	Cherry Chism (LC staff)	Horatio Mihet	Email correspondence providing pleadings to lead attorney on unrelated litigation matter for Liberty Counsel client in Florida	4	Work-Product
173	Correspondence	11/20/2009	Bonnie Gentry	Mathew Staver, Rena Lindevaldsen, Stephen Crampton, David Corry, Horatio Mihet, Mary McAlister, Anita Staver, Mathew Krause	Email correspondence providing court orders in custody litigation	24	Work-Product
174	Correspondence	11/20/2009	Bonnie Gentry	Horatio Mihet	Email correspondence discussing telephone call from counsel in unrelated litigation matter for Liberty Counsel client in Florida	1	Work-Product
175	Correspondence	9/20/2009	Horatio Mihet	Stephen Crampton, David Corry, Mathew Staver, Bonnie Gentry, LC clients in unrelated legal matter in Florida	Email correspondence providing orders and judgments in unrelated litigation matter for Liberty Counsel clients in Florida	3	Attorney-Client Work-Product
176	Correspondence	9/20/2009	Horatio Mihet, Bonnie Gentry	Horatio Mihet, Bonnie Gentry, Stephen Crampton	Email correspondence chain discussing updates, strategy, and impressions on upcoming conference call and pleadings in unrelated litigation matter for Liberty Counsel client in Florida	1	Work-Product
177	Correspondence	9/20/2009	Horatio Mihet, LC client in unrelated litigation	Horatio Mihet, LC client in unrelated litigation	Email correspondence chain discussing orders and status in unrelated litigation matter for Liberty Counsel client in Florida litigation	1	Attorney-Client Work-Product
178	Correspondence	9/21/2009	Stephen Crampton, Horatio Mihet, David Corry, Mathew Staver, LC client in unrelated litigation	Stephen Crampton, Horatio Mihet, David Corry, Mathew Staver, LC client in unrelated litigation in Florida litigation	Email correspondence chain containing numerous emails (17) providing information for draft pleadings, providing client information for same, discussing research, strategy, thoughts, impressions, and discussion of draft pleadings for unrelated litigation matter for Liberty Counsel client in Florida	55	Attorney-Client Work-Product
179	Correspondence	9/20/2009– 9/21/2009	Stephen Crampton, Horatio Mihet, Bonnie Gentry	Stephen Crampton, Horatio Mihet, Bonnie Gentry	Email correspondence chain discussing subpoena and misc. discovery issues for Liberty Counsel client in unrelated litigation matter in Florida	2	Work-Product

No.	Document Type	Date	Author(s)	Recipient(s)	Subject	Pages	Privilege
180	Correspondence	9/21/2009	Cherry Chism, Horatio Mihet	Cherry Chism, Horatio Mihet, Bonnie Gentry	Email correspondence chain providing letters concerning investigation and related discovery issues for Liberty Counsel client in unrelated litigation matter in Florida	1	Work-Product
181	Correspondence	9/21/2009	Cherry Chism	Horatio Mihet	Email correspondence chain providing letters concerning investigation and related discovery issues for Liberty Counsel client in unrelated litigation matter in Florida	1	Work-Product
182	Correspondence	9/21/2009	Anita Staver	David Corry, Horatio Mihet, LC client in unrelated litigation	Email correspondence chain discussing attorney thoughts, impressions, and opinions for unrelated litigation matter in Florida	2	Attorney-Client Work-Product
183	Correspondence	9/21/2009	Anita Staver	Horatio Mihet, David Corry	Email correspondence chain discussing attorney thoughts, impressions, and opinions in connection with unrelated litigation in Florida	2	Work-Product
184	Correspondence	9/21/2009	Horatio Mihet	Bonnie Gentry	Email correspondence providing instructions and comments concerning litigation issues for Liberty Counsel client in unrelated litigation matter in Florida	2	Work-Product
185	Correspondence	9/21/2009	Horatio Mihet	Stephen Crampton, David Corry, Bonnie Gentry	Email correspondence chain discussing pleadings filed in unrelated litigation matter for Liberty Counsel client in federal litigation in Florida	7	Work-Product
186	Correspondence	9/22/2009	Horatio Mihet, David Corry, Mathew Saver, Anita Staver, Stephen Crampton, LC client in unrelated matter	Horatio Mihet, David Corry, Mathew Saver, Anita Staver, Stephen Crampton, LC client in unrelated matter	Email correspondence chain containing numerous (18) emails discussing unrelated litigation matter for Liberty Counsel client in Florida	195	Work-Product
187	Correspondence	9/22/2009	David Corry, Horatio Mihet, Mathew Staver, Stephen Crampton	David Corry, Horatio Mihet, Mathew Staver, Stephen Crampton	Email correspondence chain containing numerous (9) emails discussing unrelated litigation matter for Liberty Counsel client in Florida	21	Work-Product
188	Correspondence	9/22/2009	Horatio Mihet, Bonnie Gentry	Horatio Mihet, Bonnie Gentry	Email correspondence chain containing numerous (8) emails discussing draft pleadings and correspondence to federal district court in unrelated litigation matter for Liberty Counsel client in Florida	18	Work-Product
189	Correspondence	9/22/2009	Horatio Mihet, David Corry, Stephen Crampton	Horatio Mihet, David Corry, Stephen Crampton	Email correspondence chain containing several emails discussing research, impressions, thoughts, strategy, arguments, and responses to motion filed in federal litigation for unrelated Liberty Counsel client in Florida	31	Work-Product
190	Correspondence	9/22/2009	Cherry Chism	Horatio Mihet	Email correspondence providing order and filing in unrelated litigation matter in Florida	4	Work-Product

No.	Document Type	Date	Author(s)	Recipient(s)	Subject	Pages	Privilege
191	Correspondence	9/22/2009	Horatio Mihet, Mathew Staver, Stephen Crampton, David Corry	Horatio Mihet, Mathew Staver, Stephen Crampton, David Corry	Email correspondence chain containing numerous emails (12) discussing draft pleadings, strategy, thoughts, impressions, and discussion with client in unrelated litigation matter for Liberty Counsel client in Florida	28	Work-Product
192	Correspondence	9/22/2009	Horatio Mihet, David Corry, Stephen Crampton	Horatio Mihet, David Corry, Stephen Crampton, Mathew Staver, Anita Staver	Email correspondence chain containing several (5) emails discussing strategy for responding to pleading filed in unrelated federal litigation for Liberty Counsel client in Florida,	6	Work-Product
193	Correspondence	9/22/2009	Horatio Mihet, Stephen Crampton, Bonnie Gentry, Cherry Chism	Horatio Mihet, Stephen Crampton, Bonnie Gentry, Cherry Chism	Email correspondence chain discussing subpoena and other discovery matters relating to unrelated litigation matter for Liberty Counsel client in Florida	3	Work-Product
194	Correspondence	9/22/2009	Horatio Mihet, Stephen Crampton, David Corry, Mathew Staver	Horatio Mihet, Stephen Crampton, David Corry, Mathew Staver, Anita Staver	Email correspondence containing numerous (10) email communications discussing draft pleadings in unrelated litigation matter for Liberty Counsel client in Florida	14	Work-Product
195	Correspondence	9/22/2009	Horatio Mihet, Bonnie Gentry, David Corry	David Corry, Horatio Mihet, Stephen Crampton, Mathew Staver, Anita Staver	Email correspondence chain discussing draft letter and communication to opposing counsel in unrelated federal litigation for Liberty Counsel client in Florida	6	Work-Product
196	Correspondence	9/22/2009	David Corry, Horatio Mihet	Horatio Mihet, David Corry, Stephen Crampton, Mathew Staver, Rena Lindevaldsen, Mary McAlister, Matthew Krause, Matthew Barber (consulting counsel), Richard Boyer, Amber Haskew (LC staff), Tessa Sturgill (former LC staff), Anthony Quaranta	Email correspondence chain containing several (5) emails discussing status of unrelated matter for Liberty Counsel client in South Dakota	6	Work-Product

No.	Document Type	Date	Author(s)	Recipient(s)	Subject	Pages	Privilege
197	Correspondence	9/22/2009	David Corry	Horatio Mihet, David Corry, Stephen Crampton, Mathew Staver, Rena Lindevaldsen, Mary McAlister, Matthew Krause, Matthew Barber, Richard Boyer, Amber Haskew, Tessa Sturgill, Anthony Quaranta	Email correspondence discussing status of unrelated matter for Liberty Counsel client in California;	1	Work-Product
198	Correspondence	9/22/2009	David Corry	Horatio Mihet, David Corry, Stephen Crampton, Mathew Staver, Rena Lindevaldsen, Mary McAlister, Matthew Krause, Matthew Barber, Richard Boyer, Amber Haskew, Tessa Sturgill, Anthony Quaranta	Email correspondence discussing status and potential settlement of unrelated matter for Liberty Counsel client in Idaho	1	Work-Product
199	Correspondence	9/22/2009	David Corry	Horatio Mihet, David Corry, Stephen Crampton, Mathew Staver, Rena Lindevaldsen, Mary McAlister, Matthew Krause, Matthew Barber, Richard Boyer, Amber Haskew, Tessa Sturgill, Anthony Quaranta	Email correspondence discussing status and potential settlement of unrelated matter for Liberty Counsel client in Florida	1	Work-Product
200	Correspondence	9/22/2009	David Corry, Stephen Crampton, Horatio Mihet	David Corry, Stephen Crampton, Horatio Mihet	Email correspondence chain containing several (6) emails discussing pleadings, strategy, thoughts, impressions and research for unrelated matter for Liberty Counsel client in federal litigation in Florida	10	Work-Product
201	Correspondence	6/22/2009	Stephen Crampton, Lisa Miller, Rena Lindevaldsen	Stephen Crampton, Lisa Miller, Rena Lindevaldsen, Horatio Mihet	Email correspondence chain discussing pleading filed in custody litigation, and requesting and receiving information for responding to same	2	Attorney-Client Work-Product

No.	Document Type	Date	Author(s)	Recipient(s)	Subject	Pages	Privilege
202	Correspondence	5/6/2009	Stephen Crampton, Rena Lindevaldsen	Lisa Miller, Rena Lindevaldsen, Mathew Staver, Stephen Crampton	Email correspondence providing update on upcoming hearing and instructions to client regarding same	2	Attorney-Client Work-Product
203	Correspondence	5/6/2009	Lisa Miller, Rena Lindevaldsen	Rena Lindevaldsen, Lisa Miller, Horatio Mihet	Email correspondence chain discussing strategy for upcoming hearing in custody litigation	2	Attorney-Client Work-Product
204	Correspondence	5/5/2009	Rena Lindevaldsen, Lisa Miller	Rena Lindevaldsen, Lisa Miller, Horatio Mihet	Email correspondence chain discussing upcoming hearing in custody litigation	2	Attorney-Client Work-Product
205	Correspondence	5/12/2009– 5/13/2009	Horatio Mihet, Rena Lindevaldsen	Rena Lindevaldsen, Lisa Miller, Mathew Staver, Stephen Crampton, Bonnie Gentry	Email correspondence chain discussing visitation order in custody litigation	3	Attorney-Client Work-Product
206	Correspondence	5/6/2009	Rena Lindevaldsen	Lisa Miller, Horatio Mihet	Email correspondence providing GAL requests to client and requesting instructions	1	Attorney-Client
207	Correspondence	5/15/2009	Rena Lindevaldsen	Lisa Miller, Horatio Mihet, Stephen Crampton, Mathew Staver	Email correspondence providing and discussing recently filed pleadings in custody litigation	9	Attorney-Client Work-Product
208	Correspondence	5/8/2009	Rena Lindevaldsen	Lisa Miller, Horatio Mihet	Email correspondence confirming previous communications relating to proposed visitation schedule	4	Attorney-Client Work-Product
209	Correspondence	3/17/2009– 3/20/2009	Rena Lindevaldsen, Lisa Miller, Stephen Crampton	Rena Lindevaldsen, Lisa Miller, Stephen Crampton, Bonnie Gentry	Email correspondence chain regarding visitation issues, and requesting and receiving information and instructions from client regarding same	3	Attorney-Client Work-Product
210	Correspondence	11/8-9/2009	Horatio Mihet, Michael Chionopolus (local counsel)	Horatio Mihet, Michael Chionopolus	Email correspondence chain discussing collaboration with local counsel on unrelated federal litigation in Florida, arranging meeting to discuss specifics of potential litigation re same	3	Work-Product
211	Correspondence	11/8-9/2009	Horatio Mihet, Michael Chionopolus	Horatio Mihet, Michael Chionopolus	Email correspondence chain discussing collaboration with local counsel on unrelated federal litigation in Florida, arranging meeting to discuss specifics of potential litigation re same	3	Work-Product
212	Correspondence	11/6/2009; 11/8/2009	Stephen Crampton, Horatio Mihet	Horatio Mihet, Stephen Crampton, David Corry, Rena Lindevaldsen, Matthew Krause, Anthony Quaranta	Email correspondence chain discussing trial preparation, staffing and strategy for unrelated litigation matter for Liberty Counsel client in Florida	2	Work-Product

No.	Document Type	Date	Author(s)	Recipient(s)	Subject	Pages	Privilege
213	Correspondence	11/9/2009	Rena Lindevaldsen	Horatio Mihet	Email correspondence providing update on research for potential motions in unrelated litigation for Liberty Counsel client in Florida	1	Work-Product
214	Correspondence	11/9/2009	Rena Lindevaldsen, Horatio Mihet	Rena Lindevaldsen, Horatio Mihet	Email correspondence chain discussing research on potential motions for unrelated litigation for Liberty Counsel client in Florida	1	Work-Product
215	Correspondence	11/9/2009	Horatio Mihet, LC client in unrelated litigation in Florida	Horatio Mihet, LC client in unrelated litigation in Florida	Email correspondence chain discussing recent court order in unrelated litigation for Liberty Counsel client in federal litigation in Florida	2	Attorney-Client Work-Product
216	Correspondence	11/9/2009	Horatio Mihet, Bonnie Gentry	Horatio Mihet, Bonnie Gentry	Email correspondence chain discussing documents for unrelated federal litigation for Liberty Counsel client in Florida	2	Work-Product
217	Correspondence	11/9/2009	Horatio Mihet	LC clients in unrelated federal litigation in Florida	Email correspondence chain discussing upcoming deposition schedule and strategy in unrelated litigation for Liberty Counsel clients in Florida	1	Attorney-Client Work-Product
218	Correspondence	11/9/2009	Horatio Mihet, Michael Chionopoulos	Horatio Mihet, Michael Chionopoulos	Email correspondence chain discussing collaboration with local counsel on unrelated federal litigation in Florida, arranging meeting to discuss specifics of potential litigation re same	3	Work-Product
219	Correspondence	11/8/2009– 11/9/2009	Horatio Mihet, Bonnie Gentry	Horatio Mihet, Bonnie Gentry	Email correspondence chain discussing documents for unrelated federal litigation for Liberty Counsel client in Florida	2	Work-Product
220	Correspondence	11/8/2009– 11/9/2009	Horatio Mihet, Bonnie Gentry	Horatio Mihet, Bonnie Gentry	Email correspondence chain discussing documents for unrelated federal litigation for Liberty Counsel client in Florida, providing instructions and discussion of documents re same	2	Work-Product
221	Correspondence	11/6/2009– 11/9/2009	Horatio Mihet, Stephen Crampton, David Corry	Horatio Mihet, Stephen Crampton, David Corry, Rena Lindevaldsen, Matthew Krause, Anthony Quaranta	Email correspondence chain discussing trial preparation, staffing and strategy for unrelated litigation matter for Liberty Counsel client in Florida	2	Work-Product
222	Correspondence	11/9/2009	Horatio Mihet, LC clients in unrelated federal litigation in Florida	Horatio Mihet, LC clients in unrelated federal litigation	Email correspondence chain discussing depositions in unrelated litigation for Liberty Counsel clients in federal court in Florida	2	Attorney-Client Work-Product
223	Correspondence	11/9/2009	Cherry Chism	Horatio Mihet	Email correspondence providing information and discussion of upcoming telephone call for unrelated litigation for Liberty Counsel client in Florida	1	Work-Product
224	Correspondence	11/9/2009	Cherry Chism	Horatio Mihet	Email correspondence providing documents filed in unrelated litigation for Liberty Counsel client in Florida	1	Work-Product

No.	Document Type	Date	Author(s)	Recipient(s)	Subject	Pages	Privilege
225	Correspondence	11/9/2009	Richard Boyer	Horatio Mihet	Email correspondence providing research memorandum and thoughts, impressions, and strategy for unrelated Liberty Counsel client matter in Florida	1	Work-Product
226	Correspondence	11/4/2009– 11/9/2009	Horatio Mihet, Government official with Florida Election Commission	Horatio Mihet, Government official with Florida Election Commission	Email correspondence chain discussing investigation and upcoming hearings concerning unrelated litigation matter for Liberty Counsel client in Florida	3	Work-Product Confidentiality and privilege mandated by Florida statute governing proceeding
227	Correspondence	11/9/2009	Horatio Mihet, Mathew Staver	Mathew Staver, Stephen Crampton, Horatio Mihet	Email correspondence chain discussing draft pleadings, research, impressions, and strategy for unrelated litigation for Liberty Counsel client in Florida	2	Work-Product
228	Correspondence	11/9/2009	Mathew Staver, Stephen Crampton, Horatio Mihet, Bonnie Gentry, LC client in unrelated litigation	Mathew Staver, Anita Staver, Stephen Crampton, Horatio Mihet, Bonnie Gentry, LC client in unrelated litigation	Email correspondence chain containing numerous emails discussing investigation, response, and potential pleadings in unrelated matter for Liberty Counsel client in Florida	30	Work-Product Confidentiality and privilege mandated by Florida statute governing proceeding
229	Correspondence	11/9/2009	Rena Lindevaldsen	Horatio Mihet	Email correspondence discussing billing and case matters for unrelated litigation for Liberty Counsel client in Florida	1	Work-Product
230	Correspondence	11/9/2009	Stephen Crampton	Mathew Staver, Anita Staver, David Corry, Mary McAlister, Horatio Mihet, Mathew Krause, Anthony Quaranta, Bonnie Gentry	Email correspondence providing internal deliberations, discussions, thoughts, and strategy for Liberty Counsel litigation matters and discussing upcoming meeting related to Liberty Counsel clients	5	Work-Product
231	Correspondence	11/10/2009	Horatio Mihet, Anita Staver, LC client in unrelated litigation	Horatio Mihet, Mathew Staver, Stephen Crampton, LC client in unrelated litigation	Email correspondence chain containing several emails discussing trial outcome and financial matters regarding unrelated litigation for Liberty Counsel client in federal court in Florida	4	Attorney-Client
232	Correspondence	11/10/2009	Cherry Chism, Horatio Mihet, Bonnie Gentry	Cherry Chism, Horatio Mihet, Bonnie Gentry	Email correspondence chain containing several emails discussing upcoming depositions and transmitting deposition notice in unrelated litigation for Liberty Counsel client in federal litigation in Florida	22	Work-Product
233	Correspondence	11/10/2009	Horatio Mihet	LC client in unrelated litigation	Email correspondence discussing unrelated litigation matter for Liberty Counsel client in Florida	2	Attorney-Client
234	Correspondence	11/11/2009	Horatio Mihet, LC client in unrelated litigation	Horatio Mihet, LC client in unrelated litigation	Email correspondence chain discussing drafts of pleadings for unrelated litigation matter for Liberty Counsel client in federal litigation in Florida	1	Attorney-Client Work-Product

No.	Document Type	Date	Author(s)	Recipient(s)	Subject	Pages	Privilege
235	Correspondence	11/10/2009	Horatio Mihet, David Corry, Stephen Crampton	Horatio Mihet, David Corry, Stephen Crampton	Email correspondence chain containing several emails discussing strategy, impressions, and thoughts for draft pleadings and responses for upcoming trial in unrelated litigation matter for Liberty Counsel client in federal litigation in Florida	9	Work-Product
236	Correspondence	11/10/2009	Horatio Mihet, Bonnie Gentry	Horatio Mihet, Bonnie Gentry, LC client in unrelated litigation	Email correspondence chain containing several emails discussing strategy, impressions, and thoughts for responses to subpoena and document requests in unrelated litigation matter for Liberty Counsel client in federal litigation in Florida	6	Attorney-Client Work-Product
237	Correspondence	11/10/2009	Horatio Mihet, Amber Haskew	Amber Haskew, Horatio Mihet	Email correspondence chain discussing personal client-related information in unrelated litigation matter for Liberty Counsel client in Florida state courts	2	Work-Product
238	Correspondence	11/8/2009– 11/10/2009	Horatio Mihet, LC client in unrelated litigation	Horatio Mihet, LC clients in unrelated litigation	Email correspondence chain containing several emails discussing upcoming depositions for unrelated litigation matter for Liberty Counsel clients in Florida	2	Attorney-Client Work-Product
239	Correspondence	11/10/2009	Horatio Mihet, Bonnie Gentry, LC client in unrelated litigation	Horatio Mihet, Bonnie Gentry, LC client in unrelated litigation	Email correspondence chain containing several emails discussing upcoming telephonic hearing concerning unrelated matter for Liberty Counsel client in Florida	5	Attorney-Client Work-Product
240	Correspondence	11/10/2009	Rena Lindevaldsen	Horatio Mihet	Email correspondence discussing research, thoughts, impressions, and strategy concerning potential motions and intervention in unrelated litigation matter for Liberty Counsel client in Florida	1	Work-Product
241	Correspondence	11/11/2009	Bonnie Gentry	Horatio Mihet	Email correspondence discussing exhibit preparation for motion in unrelated litigation matter for Liberty Counsel client in federal litigation in Florida	1	Work-Product
242	Correspondence	11/11/2009	Bonnie Gentry, Horatio Mihet	Bonnie Gentry, Horatio Mihet	Email correspondence chain discussing exhibit preparation for motion in unrelated litigation matter for Liberty Counsel client in federal litigation in Florida	2	Work-Product
243	Correspondence	11/11/2009	Stephen Crampton, Horatio Mihet, Mathew Staver	Stephen Crampton, Horatio Mihet, Mathew Staver	Email correspondence chain discussing draft pleadings for motion practice in unrelated litigation matter for Liberty Counsel client in federal litigation in Florida	31	Work-Product
244	Correspondence	11/11/2009	Horatio Mihet, Stephen Crampton	Horatio Mihet, Stephen Crampton	Email correspondence chain discussing draft pleadings for motion practice in unrelated litigation matter for Liberty Counsel client in federal litigation in Florida	2	Work-Product
245	Correspondence	11/11/2009	Anita Staver, Stephen Crampton	Stephen Crampton, Anita Staver, Angie Salas (LC staff), Bonnie Gentry, Anthony Quaranta	Email correspondence chain discussing status of unrelated litigation matter for Liberty Counsel client, discussing potential draft amicus brief re same	2	Work-Product

No.	Document Type	Date	Author(s)	Recipient(s)	Subject	Pages	Privilege
246	Correspondence	11/11/2009	Richard Boyer	Horatio Mihet	Email correspondence discussing research, thoughts, impressions, and potential pleadings for unrelated litigation for Liberty Counsel client in Florida	1	Work-Product
247	Correspondence	11/11/2009	Horatio Mihet, LC client in unrelated litigation	Horatio Mihet, LC client in unrelated litigation	Email correspondence chain containing several emails discussing draft pleadings and strategy for Liberty Counsel client in unrelated federal litigation in Florida	28	Work-Product
248	Correspondence	11/10/2009– 11/11/2009	Horatio Mihet, David Corry	Stephen Crampton, David Corry, Horatio Mihet	Email correspondence chain discussing research pertaining to subpoena issued in unrelated litigation matter for Liberty Counsel client in Ohio	2	Work-Product
249	Correspondence	11/11/2009	Horatio Mihet, LC client in unrelated litigation	Horatio Mihet, LC client in unrelated litigation	Email correspondence discussing upcoming depositions in unrelated litigation matter for Liberty Counsel clients in Florida	3	Attorney-Client Work-Product
250	Correspondence	11/11/2009	Horatio Mihet, Stephen Crampton	Horatio Mihet, Stephen Crampton	Email correspondence discussing draft pleadings, edits, thoughts, and impressions for unrelated litigation matter for Liberty Counsel client in Florida	1	Work-Product
251	Correspondence	11/11/2009	Anita Staver, Horatio Mihet	Horatio Mihet, Mathew Staver, Stephen Crampton, Anita Staver	Email correspondence chain containing several emails discussing status of unrelated litigation matter for Liberty Counsel client in state litigation in Florida	2	Work-Product
252	Correspondence	11/12/2009	Horatio Mihet, Mathew Staver, Stephen Crampton	Horatio Mihet, Mathew Staver, Stephen Crampton, LC client in unrelated litigation	Email correspondence chain discussing draft pleadings, strategy, edits, and factual information for upcoming motion practice in unrelated federal litigation for Liberty Counsel client in Florida	37	Attorney-Client Work-Product
253	Correspondence	11/12/2009	Stephen Crampton, Horatio Mihet	Stephen Crampton, Horatio Mihet	Email correspondence chain discussing draft pleadings, strategy, edits, and arguments for upcoming motion practice in unrelated federal litigation for Liberty Counsel client in Florida	4	Work-Product
254	Correspondence	11/12/2009	Anita Staver, Anthony Quaranta	Horatio Mihet, Anita Staver, Anthony Quaranta	Email correspondence chain discussing upcoming hearing in unrelated litigation for Liberty Counsel client in federal litigation in Florida	1	Work-Product
255	Correspondence	11/12/2009	Anita Staver	Mathew Staver, Horatio Mihet, Stephen Crampton, Matthew Krause, David Corry, Mary McAlister, Bonnie Gentry	Email correspondence discussing upcoming change to internal electronic server and upcoming educational seminars related to Liberty Counsel litigation efforts, discussing internal operations re same	2	Work-Product
256	Correspondence	11/5/2009– 11/12/2009	Horatio Mihet, David Corry, Stephen Crampton	Horatio Mihet, David Corry, Stephen Crampton, Bonnie Gentry	Email correspondence chain containing several emails discussing upcoming trial preparations for two separate unrelated litigation matters for Liberty Counsel clients in federal litigation in Florida	7	Work-Product

No.	Document Type	Date	Author(s)	Recipient(s)	Subject	Pages	Privilege
257	Correspondence	11/12/2009	Horatio Mihet, Stephen Crampton	Horatio Mihet, David Corry, Stephen Crampton, Mathew Staver	Email correspondence chain discussing depositions in unrelated litigation for Liberty Counsel client in federal litigation in Florida	2	Work-Product
258	Correspondence	11/13/2009	Bonnie Gentry	Horatio Mihet	Email correspondence providing court orders and discussing upcoming hearings in unrelated litigation for Liberty Counsel client in federal litigation in Florida	4	Work-Product
259	Correspondence	11/13/2009	Horatio Mihet	Stephen Crampton	Email correspondence chain discussing opposing counsel request for consent to motion and oral arguments in unrelated Florida litigation matter	2	Work-Product
260	Correspondence	11/13/2009	Cherry Chism	Horatio Mihet	Email correspondence providing and discussing subpoena issued in unrelated litigation matter for Liberty Counsel client in federal litigation in Florida	8	Work-Product
261	Correspondence	11/13/2009	Stephen Crampton, Bonnie Gentry	Horatio Mihet, Stephen Crampton, Bonnie Gentry	Email correspondence discussing recent order issued by court in unrelated litigation for Liberty Counsel client in Florida state court	2	Work-Product
262	REDACTED Name Tag Labels LC28743	Undated	n/a	n/a	Name tag labels for invitees to LC event	1	REDACTIONS: Irrelevant Business Information, Trade Secrets, Proprietary Information, First Amendment Privilege
263	REDACTED Correspondence LC28964-LC28965	3/10/2009	Lisa Miller	Rena Lindevaldsen	Email correspondence to counsel discussing visitation issues and requesting legal advice regarding same	2	REDACTIONS: Attorney-Client
264	REDACTED Correspondence LC28966	3/10/2009	Lisa Miller	Rena Lindevaldsen	Email correspondence to counsel discussing visitation issues and requesting legal advice regarding same	1	REDACTIONS: Attorney-Client
265	REDACTED Correspondence LC28967	3/11/2009	Lisa Miller	Rena Lindevaldsen, Stephen Crampton	Email correspondence to counsel discussing visitation issues and requesting legal advice regarding same	1	REDACTIONS: Attorney-Client
266	REDACTED Correspondence LC28978	3/5/2009	Stephen Crampton	Lisa Miller, Rena Lindevaldsen	Email correspondence from counsel discussing visitation issues and providing legal advice regarding same	1	REDACTIONS: Attorney-Client
267	REDACTED Correspondence LC29263	9/22/2009	Mathew Staver	Rena Lindevaldsen	Email correspondence between counsel scheduling telephone conference with consulting experts regarding VT litigation	1	REDACTIONS: Attorney-Client, Work Product

No.	Document Type	Date	Author(s)	Recipient(s)	Subject	Pages	Privilege
268	REDACTED Correspondence LC29328	11/20/2009	Janie Tedeschi	Horatio Mihet, Bonnie Gentry	Email correspondence from LC staff to counsel regarding constituent request for information about unrelated Florida litigation matter	1	REDACTIONS: Irrelevant, Confidential and Proprietary Information; First Amendment Privilege
269	REDACTED Correspondence LC29335	11/20/2009	Sarah Seitz (former LC staff)	Mathew Staver	Email correspondence from LC staff regarding constituent request for guest speakers	1	REDACTIONS: Irrelevant, Confidential and Proprietary Information; First Amendment Privilege
270	REDACTED Correspondence LC36354–LC36356	1/23/2007	Hannah Reichel, David Corry, Mary McAlister	Mathew Staver, Anita Staver, Erik Stanley, Mary McAlister, David Corry, Belinda Wetherington	Email chain among LC counsel and staff regarding constituent and former potential client's request for legal representation and LC decision not to provide representation	3	REDACTIONS: Attorney-Client, Work Product, First Amendment Privilege

¹ "LC" is an abbreviation for Liberty Counsel.

² "AF" is an abbreviation for accordion file (*e.g.*, Redweld).

Anthony R. Duprey
DUPREY LAW, PLLC
11 Main Street, Suite B110F
Vergennes, VT 05491
802-870-6563
anthony@dupreylaw.com

/s/ Horatio G. Mihet
Horatio G. Mihet*
Roger K. Gannam*
Daniel J. Schmid*
LIBERTY COUNSEL
P.O. Box 540774
Orlando, FL 32854
407-875-1776
hmihet@LC.org
rgannam@LC.org
dschmid@LC.org

*Attorneys for Defendants Liberty Counsel, Inc.
and Rena M. Lindevaldsen*

*Admitted pro hac vice

CERTIFICATE OF SERVICE

I hereby certify that on this December 7, 2020 a true and correct copy of the foregoing Privilege Log was served by electronic mail on all counsel of record for Plaintiff and Defendants, including:

Diego A. Soto (diego.soto@splcenter.org)	<i>Counsel for Plaintiff</i>
J. Tyler Clemons (Tyler.Clemons@splcenter.org)	<i>Janet Jenkins</i>
Frank H. Langrock (flangrock@langrock.com)	
Sarah Star (srs@sarahstarlaw.com)	
Brooks G. McArthur (bmcarthur@jarvismcarthur.com)	<i>Counsel for Defendant</i>
	<i>Kenneth L. Miller</i>
Michael J. Tierney (mtierney@wadleighlaw.com)	<i>Counsel for Defendant</i>
	<i>Timothy D. Miller</i>
Norman C. Smith (nc.smith@myfairpoint.net)	<i>Counsel for Defendant</i>
Adam Hochschild (adam@hochschildlaw.com)	<i>Linda Wall</i>
Michael R. Hirsh (mrhirsh@hirshandheuser.com)	<i>Counsel for Defendants</i>
	<i>Philip Zodiates,</i>
	<i>Victoria Hyden, and</i>
	<i>Response Unlimited, Inc.</i>

/s/ Horatio G. Mihet
Horatio G. Mihet
Attorney for Defendants
Liberty Counsel and Rena Lindevaldsen