

KENNETH SNYDER,)
)
 Plaintiff,)
)
 vs.) **Case No. 12-CV-2723 JAR/DJW**
)
 WILLIAM JOHNSON, et al)
)
 Defendants.)

- Lisa Loveless, Elizabeth Cottingham, Juanita Hill, Debi Massey and Stacey Serra are support staff for Defendants' counsel.
- Shoshana Clark, Danielle Shirley, and Cara McLaughlin were support staff for Defendants' counsel but are no longer at McAnany Van Cleave Phillips, PA.
- Kenneth Moore, Jody Boeding and Angela Lawson are attorneys for Unified Government of Wyandotte County/Kansas City, Kansas.
- Due to the volume of some reports, those that were marked with an "(NP)" on the email have not been printed. Upon request, those reports that are not privileged can be provided on disk.
- In addition, reports which include BPU customer information (addresses, etc.), have been withheld. These reports are irrelevant to this lawsuit and would certainly not lead to the discovery of admissible evidence. The bates numbers for this report are as follows: DEFS001008-1792; DEFS0002016-2634.

Document Date	From	To	Bates No.	Description	Nature of Privilege
6/25/2013	Eric Clark	Mail Journal	DEFS000529	Partially redacted, notification of email receipt from and with Elizabeth Cottingham, Eric Clark, William Johnson, Jane Sieve-Wilson and Debi Massey to discuss	Attorney-Client, Work Product

				litigation	
6/24/2013	William Johnson	Wajohn57@sbcglobal.net	DEFS000530-537	Partially redacted, email correspondence and attachments from counsel discussing proposed discovery responses	Attorney-Client, Work Product
6/24/2013	Lisa Loveless	Sam DeLeon, Eric Clark, William Johnson, Robert Wonnell and Debi Massey	DEFS000538-540	Email correspondence with attachment providing discussion related to order extending deadlines	Attorney-Client, Work Product
6/24/2013	Eric Clark	eclark007@hotmail.com	DEFS000541	Attachments redacted- all are email correspondence between defendants and counsel	Attorney-Client Privilege
6/21/2013	Jane Sieve-Wilson	Sam DeLeon, Eric Clark, William Johnson, Robert Wonnell, Debi Massey and Lisa Loveless	DEFS000542-549, DEFS000683-690	Email correspondence providing draft pleadings for review and comment	Attorney-Client Privilege and Work Product
6/20/2013	Jane Sieve-Wilson	Eric Clark, William Johnson, Sam DeLeon, Robert Wonnell, Debi Massey	DEFS000550-595	Email correspondence discussing potential amended pleadings	Attorney-Client Privilege and Work Product
6/19/2013	William Johnson	Mail Journal	DEFS000914	Partially redacted, notification of email receipt from and with Elizabeth Cottingham, Eric Clark, William Johnson, Jane Sieve-Wilson and Debi Massey to discuss litigation	Attorney-Client Privilege and Work Product
6/19/2013	Elizabeth Cottingh	Sam DeLeon	DEF915-917	Email correspondence responding to discovery update	Attorney-Client Privilege

	am			response	and Work Product
6/19/2013	Sam DeLeon	Elizabeth Cottingham, Eric Clark, William Johnson, Jane Sieve-Wilson, Debi Massey	DEFS000918-920	Email correspondence responding to discovery update from counsel	Attorney-Client Privilege
6/19/2013	Elizabeth Cottingham	Sam DeLeon, Eric Clark, William Johnson, Jane Sieve-Wilson, Debi Massey	DEFS000921-938	Email correspondence with attachment providing discovery update	Attorney-Client Privilege/Work-Product
6/17/2013	Jane Sieve-Wilson	Sam DeLeon	DEFS000939-942	Email correspondence providing draft discovery response for review and approval	Attorney-Client and Work Product
6/14/2013	Eric Clark	Elclark007@hotmail.com	DEFS000943-949	Partially redacted, includes email correspondence from counsel to defendants as well as attached letter correspondence from counsel to defendants discussing litigation information	Attorney-Client and Work Product
6/14/2013	Eric Clark	Elclark007@hotmail.com	DEFS000950-952	Partially redacted, includes email correspondence from counsel to defendants as well as attached letter correspondence from counsel to defendants discussing litigation update and strategy	Attorney-Client Privilege and Work Product
6/14/2013	Eric Clark	Elclark007@hotmail.com	DEFS000954-961	Partially redacted, includes email correspondence from counsel to defendants as well as attached letter correspondence	Attorney-Client Privilege and Work Product

				from counsel to defendants providing discovery update	
6/14/2013	Eric Clark	Elclark007@hotmail.com	DEFS000962-968	Partially redacted, includes email correspondence from counsel to defendants as well as attached letter correspondence from counsel to defendants discussing mediation deadline	Attorney-Client Privilege and Work Product
6/14/2013	Eric Clark	Elclark007@hotmail.com	DEFS0009690970	Partially redacted, includes email correspondence from counsel to defendants as well as attached letter correspondence from counsel to defendants discussing expert report disclosure	Attorney-Client Privilege and Work Product
6/14/2013	Eric Clark	Elclark007@hotmail.com	DEFS000971-990	Partially redacted, includes email correspondence from counsel to defendants as well as attached letter correspondence from counsel to defendants discussing strategy	Attorney-Client Privilege and Work Product
6/14/2013	Eric Clark	Elclark007@hotmail.com	DEF991-996	Partially redacted, includes email correspondence from counsel to defendants as well as attached letter correspondence from counsel to defendants discussing potential motion to compel and related deadlines	Attorney-Client Privilege and Work Product
6/14/2013	Eric Clark	Elclark007@hotmail.com	DEF997-1000	Partially redacted, includes email correspondence from counsel to defendants as well as attached	Attorney-Client Privilege and Work Product

				letter correspondence from counsel to defendants discussing mediation	
6/13/2010	Lisa Loveless	Sam DeLeon, Eric Clark, William Johnson, Robert Wonnell and Debi Massey	DEFS001001-1005	Email correspondence to clients with attached letter discussing motion to extend deadline for motion to compel	Attorney-Client Privilege and Work Product
6/10/2013	Jane Sieve-Wilson	Sam DeLeon, Robert Wonnell, Debi Massey, Lisa Loveless	DEFS001793-1798	Email correspondence discussing documents responsive to 3 rd request for production	Attorney-Client Privilege and Work Product
6/7/2013	Elizabeth Cottingham	Sam DeLeon, Eric Clark, Robert Wonnell and Debi Massey	DEFS001799-1801	Email correspondence providing mediation information and letter from mediator	Attorney-Client Privilege and Work Product
6/6/2013	Lindsay Krstolic	Sam DeLeon	DEFS001990	Email correspondence discussing documents needed as requested by counsel to respond to discovery requests	Work Product
6/6/2013	Sam DeLeon	Lindsay Krstolic	DEFS001991	Email correspondence discussing documents needed as requested by counsel to respond to discovery requests	Work Product
6/6/2013	Sam DeLeon	Jessica Leiker	DEFS001992-1993	Email correspondence discussing documents needed as requested by counsel to respond to discovery requests	Work Product
6/6/2013	Jessica Leiker	Sam DeLeon	DEFS001994	Email correspondence discussing documents needed as requested by counsel to respond to discovery requests	Work Product
6/6/2013	Sam DeLeon	Robert Wonnell, Eric Clark, William Johnson, Jane Sieve-Wilson,	DEFS001995-1997	Email correspondence discussing defense matters and expert disclosures	Attorney-Client Privilege and Work Product

		Sam DeLeon			
6/6/2013	Robert Wonnell	Sam DeLeon, Eric Clark, William Johnson, Jane Sieve-Wilson, Sam DeLeon	DEFS001998-2000	Email correspondence regarding defense matters and expert disclosures	Attorney-Client Privilege and Work Product
6/6/2013	William Johnson	Mail Journal	DEFS001989	Partially redacted, Mail Journal	
6/4/2013	Sam DeLeon	Ashley Culp, Sam DeLeon	DEFS002001-2013	Partially redacted, forwarded email correspondence from counsel discussing discovery requests	Attorney-Client Privilege and Work Product
6/3/2013	Jane Sieve-Wilson	Sam DeLeon	DEFS002635-2646	Email correspondence discussing 2 nd interrogatories and golden rule letter	Attorney-Client Privilege and Work Product
5/31/2013	Elizabeth Cottingham	Sam DeLeon, Eric Clark, Robert Wonnell, Debi Massey	DEFS002647-2652	Email correspondence with attachment discussing outstanding discovery issues and order related to motion to compel	Attorney-Client Privilege and Work Product
5/29/2013	Kenneth Moore	Jody Boeding, Angela Lawson	DEFS002905-2906	Email correspondence between counsel regarding defense issues	Attorney-Client Privilege and Work Product
5/29/2013	Jody Boeding	Kenneth Moore, Angela Lawson	DEFS002907-2908	Email correspondence between counsel regarding defense issues	Attorney-Client Privilege and Work Product
5/29/2013	Angela Lawson	Kenneth Moore, Jody Boeding	DEFS002909-2910	Email correspondence between counsel regarding defense matters	Attorney-Client Privilege and Work Product
5/29/2013	Jody Boeding	Kenneth Moore, Angela Lawson	DEFS002911	Email correspondence between counsel regarding defense issues	Attorney-Client Privilege and Work Product
5/24/2013	Elizabeth	Sam DeLeon,	DEFS002912	Email correspondence	Attorney-

	h Cottingham	Eric Clark, William Johnson, Robert Wonnell, Debi Massey	-2931	regarding expert designation	Client Privilege and Work Product
5/22/2013	Jane Sieve- Wilson	Sam DeLeon, Robert Wonnell, Debi Massey, Shoshana Clark	DEFS002932	Email correspondence providing proposed documents to be produced pursuant to discovery requests	Attorney- Client Privilege and Work Product
5/16/2013	Elizabeth h Cottingham	Sam DeLeon, Eric Clark, William Johnson, Robert Wonnell, Debi Massey	DEFS003053 -3054	Email correspondence regarding mediation deadline and the extension of the same	Attorney- Client Privilege and Work Product
4/24/2013	Robert Wonnell	Sam DeLeon	DEFS003055 -3068	Email correspondence regarding discovery responses and additional information/documents needed	Attorney- Client Privilege and Work Product
4/8/2013	Ashley Culp	Stephanie Sestrich	DEFS003069 -3070	Partially redacted, email correspondence from counsel providing discovery information	Attorney- Client Privilege and Work Product
4/8/2013	Stephanie Sestrich	Ashley Culp	DEFS003071 -3072	Email correspondence discussing correspondence from counsel	Work Product
4/5/2013	Elizabeth h Cottingham	Sam DeLeon, Eric Clark, William Johnson, Robert Wonnell, Debi Massey	DEFS003077	Email correspondence with attachment discussing Rule 26 disclosures	Attorney- Client Privilege and Work Product
3/28/2013	Jane Sieve- Wilson	Sam DeLeon	DEFS003084 -3096	Email correspondence with attachments discussing discovery issues	Attorney- Client Privilege and Work Product

3/22/2013	Sam DeLeon	Jane Sieve-Wilson	DEFS003305	Email correspondence with attachments discussing discovery issues	Attorney-Client Privilege and Work Product
3/22/2013	Jane Sieve-Wilson	Sam DeLeon	DEFS003306-3307	Email correspondence with attachments discussing discovery issues	Attorney-Client Privilege and Work Product
3/21/2013	Elizabeth Cottingham	Sam DeLeon, Eric Clark, William Johnson, Robert Wonnell, Debi Massey	DEFS003502	Email correspondence with attachment discussing protective order	Attorney-Client Privilege and Work Product
3/21/2013	Sam DeLeon	Jane Sieve-Wilson, Elizabeth Cottingham, Sam DeLeon, Ashley Culp	DEFS003513-3533	Email communication responding to correspondence from counsel requesting information	Attorney-Client Privilege and Work Product
3/21/2013	Elizabeth Cottingham	Mail Journal	DEFS003534	Email read receipt	Attorney-Client
3/21/2013	Jane Sieve-Wilson	Mail Journal	DEFS003535	Email read receipt	Attorney-Client
3/21/2013	Sam DeLeon	Elizabeth Cottingham, Jane Sieve-Wilson	DEFS003536-3537	Email correspondence responding to discovery requests	Attorney-Client Privilege and Work Product
3/21/2013	Elizabeth Cottingham	Sam DeLeon, Jane Sieve-Wilson	DEFS003538-3557	Email correspondence responding to discovery requests	Attorney-Client Privilege and Work Product
3/20/2013	Robert Wonnell	Sam DeLeon, Eric Clark, William Johnson, Jody Boeding, Carl Gallagher, Jane	DEFS003558	Email correspondence regarding plaintiff settlement offer	Attorney-Client Privilege and Work Product

		Sieve-Wilson, Shoshana Clark, Debi Massey			
3/20/2013	Jane Sieve- Wilson	Eric Clark, William Johnson, Sam DeLeon, Robert Wonnell, Debi Massey	DEFS003560 -3604	Email correspondence discussing deadlines	Attorney- Client Privilege and Work Product
3/18/2013	Debi Massey	Don Gray, Angela Lawson, Lori Austin, Jody Boeding, Carl Gallagher, Robert Wonnell, Jane Sieve-Wilson, Debi Massey, David Menghini, Bev Perry	DEFS003605 -3634	Email correspondence providing litigation information	Attorney- Client Privilege and Work Product
3/14/2013	Sam DeLeon	Ashley Culp	DEFS003884 -3885	Email correspondence discussing correspondence from counsel	Work Product
3/14/2013	Ashley Culp	Sam DeLeon	DEFS003886 -3887	Email correspondence discussing correspondence from counsel	Work Product
3/14/2013	William Johnson	Mail Journal	DEFS003888	Partially redact, message to counsel	Attorney- client
3/14/2013	Elizabeth Cottingham	Mail Journal	DEFS003905	Read receipt	Attorney- Client
3/14/2013	Ashley Culp	Mail Journal	DEFS003906	Partially redact, read receipt	Attorney- Client
3/14/2013	Sam DeLeon	Ashley Culp, Sam DeLeon,	DEFS003907 -3910	Email correspondence discussing	Work Product,

		Robert Wonnell		correspondence from counsel	Attorney-Client
3/14/2013	Sam DeLeon	Elizabeth Cottingham, William Johnson, Eric Clark, Robert Wonnell, Sam DeLeon	DEFS003911-12	Email responding to correspondence from counsel	Work Product, Attorney-Client
3/14/2013	Elizabeth Cottingham	Sam DeLeon, William Johnson, Eric Clark, Robert Wonnell	DEFS003913-15	Email correspondence discussing deadlines and settlement offers	Work-Product, Attorney-Client
3/14/2013	Sam DeLeon	Elizabeth Cottingham, William Johnson, Eric Clark, Robert Wonnell	DEFS006556-57	Email responding to correspondence from counsel	Work Product, Attorney-Client
3/7/2013	Sam DeLeon	Ashley Culp	DEFS003916-3917	Email correspondence providing information related to outstanding litigation	Work Product
3/7/2013	William Johnson	Mail Journal	DEFS003918	Partially redacted, correspondence with counsel	Attorney-client
3/7/2013	Sam DeLeon	Debi Massey, Eric Clark, William Johnson, Jane Sieve-Wilson, Robert Wonnell	DEFS003919-3920	Email correspondence regarding Rule 26 disclosures	Work Product, Attorney-Client
3/6/2013	William Johnson	<u>Wajohn57@sb</u> <u>cglobal.net</u>	DEFS004100	Partially redacted, attached email correspondence with attachments from counsel providing discovery documents	Work Product, Attorney-Client

3/6/2013	Debi Massey	Sam DeLeon, Eric Clark, William Johnson, Jane Sieve-Wilson, Robert Wonnell, Debi Massey	DEFS004101-4175, DEFS004176-4250	Email correspondence discussing Rule 26 disclosures	Work Product, Attorney-Client
2/25/2013	Debi Massey	Don Gray, Debi Massey	DEFS004251-4255	Email correspondence regarding outstanding litigation	Attorney-Client
2/25/2013	Debi Massey	Lori Austin, Don Gray, Jody Boeding, Robert Wonnell, Carl Gallagher, Jane Sieve-Wilson, Debi Massey	DEFS004256-4259	Email correspondence regarding outstanding litigation	Attorney-Client
2/20/2013	William Johnson	Wajohn57@sb cglobal.net	DEFS004260	Partially redacted, attached email correspondence with attachments discussing motion to dismiss and other litigation matters	Work Product, Attorney-Client
2/20/2013	Robert Wonnell	Jody Boeding, William Johnson, Eric Clark, Sam DeLeon, Jane Sieve-Wilson, Carl Gallagher, Shoshana Clark, Stacey Serra, Debi Massey	DEFS004261-4269, DEFS004270-4278	Email correspondence with attachments discussing motion to dismiss and other litigation matters	Work Product, Attorney-Client
2/12/2013	William Johnson	Wajohn57@sb cglobal.net	DEFS004279-4283	Partially redacted, attached email correspondence from counsel providing litigation status update	Work Product, Attorney-Client
2/12/2013	Sam DeLeon	Nina Day, Stephanie Sestrich, Sam DeLeon	DEFS004286-4291	Email correspondence to employees with attachment discussing litigation status update provided by counsel	Work Product, Attorney-Client

2/11/2013	Debi Massey	Sam DeLeon, Eric Clark, William Johnson, Jane Sieve-Wilson, Robert Wonnell, Debi Massey	DEFS004456-4460	Email correspondence discussing litigation status update provided by counsel	Work Product, Attorney-Client
1/25/2013	Elizabeth Cottingham	Sam DeLeon, Eric Clark, William Johnson, Eric Clark, Jane Sieve-Wilson, Robert Wonnell	DEFS004461-4468	Email correspondence providing case status update and relevant dates	Work Product, Attorney-Client
1/16/2013	Eric Clark	Elclark007@hotmail.com	DEFS004469-4504	Partially redacted, email from counsel and attachments providing draft pleadings	Work Product, Attorney-Client
1/14/2013	Jane Sieve-Wilson	Sam DeLeon	DEFS004505-4517	Email correspondence providing draft pleadings	Work Product, Attorney-Client
1/14/2013	William Johnson	Sam DeLeon, Jane Sieve-Wilson, Eric Clark, Robert Wonnell, Debi Massey	DEFS004518-4530	Email correspondence discussing case strategy	Work Product, Attorney-Client
1/14/2013	Jane Sieve-Wilson	Sam DeLeon	DEFS000597-598	Email correspondence with draft pleadings attached for review and response	Work Product, Attorney-Client
1/13/2013	William Johnson	Wajohn57@sbcglobal.net	DEFS004531-4543	Partially redacted, email correspondence from counsel with attached draft pleadings	Work Product, Attorney-Client
1/11/2013	William Johnson	Wajohn57@sbcglobal.net	DEFS000004544-4579	Partially redacted, email correspondence from counsel with attached draft pleadings	Work Product, Attorney-Client
1/11/2013	Sam	Jane Sieve-	DEFS004580	Email correspondence	Work

	DeLeon	Wilson, William Johnson, Eric Clark, Robert Wonnell, Debi Massey, Sam DeLeon	-4615	with counsel discussing draft pleadings and potential issues	Product, Attorney- Client
1/11/2013	Sam DeLeon	Sam DeLeon	DEFS004616 -4627	Partially redacted, attachment containing draft pleading from counsel	Work Product
1/11/2013	Jane Sieve- Wilson	Sam DeLeon, William Johnson, Eric Clark, Robert Wonnell, Debi Massey	DEFS000599 -600	Email correspondence providing draft answers for review and comments	Work Product, Attorney- Client
1/10/2013	William Johnson	Wajohn57@sb cglobal.net	DEFS004628 -4662	Partially redacted, attachment containing draft pleading from counsel	Work Product
1/9/2013	Jane Sieve- Wilson	William Johnson, Eric Clark, Sam DeLeon, Robert Wonnell, Debi Massey	DEFS000601 -635; 4663- 4697	Email correspondence containing draft pleading and discussing review of the same	Work Product, Attorney- Client
1/7/2013	Robert Wonnell	Sam DeLeon, William Johnson, Eric Clark, Jane Sieve-Wilson, Carl Gallagher, Shoshana Clark, Debi Massey	DEFS004698 -4711	Email correspondence discussing pleadings related issues	Work Product, Attorney- Client
1/3/2013	Jane Sieve- Wilson	Sam DeLeon, William Johnson, Eric Clark, Robert Wonnell, Debi Massey	DEFS000636 -642; 4712- 4718	Email correspondence discussing motion to dismiss and answer date	Work Product, Attorney- Client
1/3/2013	Sam DeLeon	William Johnson	DEFS004719 -4723	Email correspondence including email from counsel and attached	Work Product, Attorney-

				letter from counsel regarding pleadings filed with court	Client
1/2/2013	Shoshana Clark	Sam DeLeon, Debi Massey, Robert Wonnell	DEFS004724-4728	Email correspondence with attachment discussing pleadings filed with court	Work Product, partial Attorney-Client
12/6/2012	Sam DeLeon	Sam DeLeon, William Johnson, Eric Clark	DEFS0004729-4769	Email correspondence forwarding and discussing email correspondence from counsel regarding litigation strategy and filings	Work Product, partial Attorney-Client
12/5/2012	Jane Sieve-Wilson	Sam DeLeon, Henry Couchman, William Johnson, Eric Clark, Debi Massey, Robert Wonnell, Carl Gallagher	DEFS000643-682, 4797-4836	Email correspondence discussing litigation strategy and draft pleadings for review and approval	Work Product, Attorney-Client
12/5/2012	William Johnson	Wajohn57@sbcglobal.net	DEFS004770-4783, 4784-4796	Partially redacted, email and attachments send from counsel	Work Product, Attorney-Client
11/25/2012	Jane Sieve-Wilson	Mail Journal	DEFS004950	Email notification of acceptance of calendar invitation	Work Product, Attorney-Client
11/21/2012	Jane Sieve-Wilson	Mail Journal	DEFS005165	Email read notification	Work Product, Attorney-Client
11/21/2012	Robert Wonnell	Mail Journal	DEFS006549	Email notification of acceptance of calendar invitation	Work Product, Attorney-Client
11/21/2012	Robert Wonnell	Mail Journal	DEFS006550	Email read notification	Work Product, Attorney-Client
11/21/2012	Sam DeLeon	Robert Wonnell,	DEFS006551	Calendar invite to discuss litigation	Work Product,

		William Johnson, Debi Massey, Jane Sieve-Wilson			Attorney-Client
11/19/2012	Jody Boeding	Mail Journal	DEFS005354	Email read notification	Work Product, Attorney-Client
11/19/2012	William Johnson	Mail Journal	DEFS005355	Email read notification	Attorney-Client
11/19/2012	Sam DeLeon	Jody Boeding, Kevin Moore	DEFS005356	Email correspondence regarding meeting to discuss litigation	Work Product, Attorney-Client
11/15/2012	Sam DeLeon	Jody Boeding, Sam DeLeon	DEFS005357-5358	Email correspondence providing correspondence regarding litigation from counsel	Work Product, Attorney-Client
5/3/2012	Carl Gallagher	Mail Journal	DEFS005496	Email read notification	Work Product, Attorney-Client
5/3/2012	Robert Wonnell	Sam DeLeon	DEFS005497-5500, 5359-5362	Email correspondence discussing potential litigation issues	Work Product, Attorney-Client
5/3/2012	Robert Wonnell	Mail Journal	DEFS005501	Email read notification	Work Product, Attorney-Client
5/3/2012	Sam DeLeon	Robert Wonnell, Carl Gallagher, Sam DeLeon, Debi Massey	DEFS005502-03	Email correspondence regarding potential litigation	Work Product, Attorney-Client
4/20/2012	Cara McLaughlin	Sam DeLeon, Robert Wonnell, Debi Massey	DEFS005504-06	Email correspondence with attachments discussing potential litigation	Work Product, Attorney-Client
4/18/2012	Stephanie Sestrich	Mail Journal	DEFS005507	Email read notification	Work Product, Attorney-Client
4/18/2012	Sam DeLeon	Robert Wonnell, Carl	DEFS005508	Email correspondence regarding discussions	Work Product,

		Gallagher, Debi Massey		with Snyder	Attorney- Client
4/18/2012	Robert Wonnell	Sam DeLeon, Carl Gallagher, Debi Massey, Sam DeLeon	DEFS005509 -5511	Email correspondence regarding potential litigation issues related to Snyder interactions	Work Product, Attorney- Client
4/18/2012	Carl Gallagh er	Mail Journal	DEFS005512	Email read notification	Work Product, Attorney- Client
4/18/2012	Carl Gallagh er	Mail Journal	DEFS005513	Email read notification	Attorney- Client
4/17/2012	William Johnson	Mail Journal	DEFS005514	Email read notification	Attorney- Client
4/17/2012	Robert Wonnell	Mail Journal	DEFS005515	Email read notification	Work Product, Attorney- Client
4/18/2012	Sam DeLeon	Robert Wonnell, Carl Gallagher, Debi Massey	DEFS005516 -5518	Email correspondence regarding Snyder interactions	Work Product, Attorney- Client
4/17/2012	Robert Wonnell	Mail Journal	DEFS005522	Email read notification	Work Product, Attorney- Client
4/17/2012	Sam DeLeon	William Johnson, Robert Wonnell, Carl Gallagher, Stephanie Sestrich, Sam DeLeon	DEFS005523 -24	Email correspondence regarding Snyder settlement	Work Product, Attorney- Client
4/17/2012	Robert Wonnell	William Johnson, Sam DeLeon, Carl Gallagher, Stephanie Sestrich	DEFS005525 -5526	Email correspondence regarding issues related to Snyder settlement	Work Product, Attorney- Client
4/16/2012	Jane Sieve- Wilson	Mail Journal	DEFS005529	Email read notification	Work Product, Attorney- Client
4/16/2012	Sam	Don Gray,	DEFS005531	Partially redacted,	Work

	DeLeon	Jenny Burley-Krenzer, James Epp, Sam DeLeon	-5532	forwarded email sent from counsel regarding potential litigation	Product, Attorney-Client
4/16/2012	William Johnson	Mail Journal	DEFS005533	Partially redacted, email read notification	Attorney-Client
4/16/2012	Robert Wonnell	Mail Journal	DEFS005534	Email read notification	Work Product, Attorney-Client
4/16/2012	Stephanie Sestrich	Mail Journal	DEFS005535	Partially redacted, email read notification	Work Product, Attorney-Client
4/16/2012	Nina Day	Mail Journal	DEFS005536	Partially redacted, email read notification	Work Product, Attorney-Client
4/16/2012	Philip Musser	Sam DeLeon	DEFS005537	Partially redacted, email correspondence from counsel discussing Snyder attorney letter	Work Product, Attorney-Client
4/16/2012	Carl Gallagher	Mail Journal	DEFS005538	Email read notification	Work Product, Attorney-Client
4/16/2012	Philip Musser	Mail Journal	DEFS005539	Email read notification	Work Product, Attorney-Client
4/16/2012	Carl Gallagher	Sam DeLeon	DEFS005540	Email communication discussing Snyder attorney letter	Work Product, Attorney-Client
4/16/2012	Sam DeLeon	Robert Wonnell, William Johnson, Philip Musser, Eric Clark, Carl Gallagher, Jane Sieve-Wilson, Sam DeLeon, Stephanie Sestrich, Nina	DEFS005541	Email communication discussing Snyder attorney letter	Work Product, Attorney-Client

		Day			
1/31/2011	Robert Wonnell	Mail Journal	DEFS005707	Email read notification	Attorney-Client
1/31/2011	Robert Wonnell	Mail Journal	DEFS005708	Email read notification	Attorney-Client
1/25/2011	Sam DeLeon	Sam DeLeon	DEFS005768-69	Partially redacted, attached memorandum regarding DOL statements drafted at direction of counsel	Work Product
1/22/2011	Sam DeLeon	Robert Wonnell, Jody Boeding, Carl Gallagher, Debi Massey, Danielle Shirley Sam DeLeon	DEFS005570	Email communication regarding communication from plaintiff as it relates to potential litigation	Work Product, Attorney-Client
1/19/2011	Robert Wonnell	Sam DeLeon, Danielle Shirley, Debi Massey, Carl Gallagher	DEFS005771-5801	Email correspondence regarding investigation and potential litigation	Work Product, Attorney-Client
1/18/2011	Sam DeLeon	Robert Wonnell	DEFS005802-5804	Email correspondence discussing meeting to discuss union matters and potential litigation	Work Product, Attorney-Client
1/18/2011	Sam DeLeon	Robert Wonnell	DEFS005805-5807	Email correspondence discussing statements made by Snyder	Work Product, Attorney-Client
1/18/2011	Robert Wonnell	Sam DeLeon	DEFS005808-5810	Email correspondence related to statements of plaintiff in anticipation of litigation	Work Product, Attorney-Client
1/18/2011	Sam DeLeon	Robert Wonnell	DEFS005811-5813	Email correspondence discussing meeting to discuss union matters and potential litigation	Work Product, Attorney-Client
1/18/2011	Robert Wonnell	Sam DeLeon	DEFS005814-16	Email correspondence discussing meeting to discuss union matters and potential litigation	Work Product, Attorney-Client
1/18/2011	Robert Wonnell	Sam DeLeon	DEFS005817-5818	Email correspondence discussing statements made by Snyder	Work Product, Attorney-

					Client
1/18/2011	Sam DeLeon	Robert Wonnell	DEFS005819-5820	Email correspondence discussing statements made by Snyder	Work Product, Attorney-Client
1/5/2011	Sam DeLeon	Sam DeLeon	DEFS005821	Partially redacted, attachment drafted at direction of counsel	Work Product
1/4/2011	Sam DeLeon	Sam DeLeon	DEFS005822-5824	Partially redacted, attachment containing draft response to DOL	Work Product, Attorney-Client
12/17/2010	Sam DeLeon	Jody Boeding	DEFS005825-5827	Email correspondence discussing DOL investigation and response	Work Product, Attorney-Client
12/17/2010	Jody Boeding	Sam DeLeon	DEFS005828-30	Email correspondence discussing ethics matters	Work Product, Attorney-Client
12/17/2010	Sam DeLeon	Jody Boeding, Sam DeLeon	DEFS005831-35	Email correspondence discussing DOL investigation and response	Work Product, Attorney-Client
12/17/2010	Sam DeLeon	Jody Boeding	DEFS005838-40	Email correspondence discussing DOL investigation and response	Work Product, Attorney-Client
12/17/2010	Jody Boeding	Sam DeLeon	DEFS005836-37	Email correspondence discussing DOL investigation and response	Work Product, Attorney-Client
12/16/2010	Sam DeLeon	Jody Boeding	DEFS005841-42	Email correspondence discussing DOL investigation and ethics complaint	Work Product, Attorney-Client
12/16/2010	Jody Boeding	Sam DeLeon	DEFS005843-44	Email correspondence discussing DOL investigation and ethics complaint	Work Product, Attorney-Client
12/16/2010	Jody Boeding	Mail Journal	DEFS005845, 5851	Email read notification	Attorney-Client
12/16/2010	Sam DeLeon	Jody Boeding, Sam DeLeon	DEFS005846-5850	Email correspondence discussing DOL investigation and ethics complaint	Work Product, Attorney-Client

12/16/2010	Sam DeLeon	Jody Boeding, Sam DeLeon	DEFS006553-55	Email correspondence discussing DOL investigation and ethics complaint	Work Product, Attorney-Client
12/16/2010	Jody Boeding	Mail Journal	DEFS006552	Email read notification	Attorney-Client
12/2/2010	Sam DeLeon	Carl Gallagher, Robert Wonnell, Debi Massey, Sam DeLeon	DEFS005860-62	Email correspondence with attached draft correspondence to DOL investigator	Work Product, Attorney-Client
11/10/2010	Danielle Shirley	Mail Journal	DEFS005878	Email read notification	Attorney-Client
11/8/2010	Sam DeLeon	Mail Journal	DEFS005879	Email read notification	Attorney-Client
11/8/2010	Carl Gallagher	Sam DeLeon, Robert Wonnell	DEFS005880-5886	Email communication discussing DOL investigation status	Work Product, Attorney-Client
11/8/2010	Carl Gallagher	Mail Journal	DEFS005887	Email read notification	Attorney-Client
11/8/2010	Sam DeLeon	Carl Gallagher, Robert Wonnell, Sam DeLeon	DEFS005888-5892	Email communication discussing DOL investigation status	Work Product, Attorney-Client
11/8/2010	Robert Wonnell	Mail Journal	DEFS005893	Email read notification	Attorney-Client
11/8/2010	Carl Gallagher	Sam DeLeon, Robert Wonnell, Danielle Shirley, Debi Massey	DEFS005894-5898	Email communication discussing DOL investigation status	Work Product, Attorney-Client
11/8/2010	Carl Gallagher	Mail Journal	DEFS005899	Email read notification	Attorney-Client
11/8/2010	Sam DeLeon	Robert Wonnell, Danielle Shirley, Debi Massey, Carl Gallagher, Sam DeLeon	DEFS005900-5903	Email communication discussing DOL investigation status	Work Product, Attorney-Client
11/8/2010	Robert Wonnell	Sam DeLeon, Danielle	DEFS005904-5907	Email communication discussing DOL	Work Product,

		Shirley, Debi Massey, Carl Gallagher		investigation status	Attorney- Client
10/26/2010	Jody Boeding	Mail Journal	DEFS005919	Email read notification	Attorney- Client
10/18/2010	Sam DeLeon	William Johnson, Sam DeLeon	DEFS005926	Partially redacted, attachment drafted at direction of counsel	Work- Product
10/18/2010	Sam DeLeon	Mike Manske, Jody Boeding, Sam DeLeon	DEFS005930	Partially redacted, attachment drafted at direction of counsel	Work- Product
10/22/2010	Jody Boeding	Mail Journal	DEFS005927	Email read notification	Attorney- Client
10/21/2010	Robert Wonnell	Mail Journal	DEFS005935	Email read notification	Attorney- Client
10/21/2010	Robert Wonnell	Mail Journal	DEFS005936	Email read notification	Attorney- Client
10/21/2010	Carl Gallagher	Mail Journal	DEFS005937	Email read notification	Attorney- Client
10/21/2010	Jody Boeding	Mail Journal	DEFS005938	Email read notification	Attorney- Client
10/21/2010	Danielle Shirley	Mail Journal	DEFS005947	Email read notification	Attorney- Client
10/20/2010	Sam DeLeon	Jody Boeding, Carl Gallagher, Robert Wonnell, Debi Massey, Danielle Shirley	DEFS005942 -5944	Email correspondence related to ethics complaints	Attorney- Client, Work Product
10/20/2010	Jody Boeding	Sam DeLeon, Carl Gallagher, Robert Wonnell, Debi Massey, Danielle Shirley	DEFS005945	Email correspondence related to ethics complaints	Attorney- Client, Work Product
10/20/2010	Carl Gallagher	Mail Journal	DEFS005946	Email read notification	Attorney- Client
10/20/2010	Danielle Shirley	Mail Journal	DEFS005941	Email read notification	Attorney- Client
10/20/2010	Robert Wonnell	Sam DeLeon	DEFS005948	Email correspondence responding to ethics matters	Attorney- Client, Work

					Product
10/20/2010	Jody Boeding	Mail Journal	DEFS005940 , 5949	Email read notification	Attorney-Client
10/20/2010	Sam DeLeon	Jody Boeding, Carl Gallagher, Robert Wonnell, Debi Massey, Danielle Shirley, Sam DeLeon	DEFS005950 -5951	Email correspondence discussing ethics complaint response	Attorney-Client, Work Product
10/20/2010	Sam DeLeon	Sam DeLeon	DEFS005952 -5953	Partially redacted, attachment containing document produced at direction of counsel	Work Product
10/15/2010	Sam DeLeon	William Johnson, Sam DeLeon	DEFS005954 -56	Email correspondence discussing draft response to DOL	Work Product
10/15/2010	Juanita Hill	Sam DeLeon, Carl Gallagher, Robert Wonnell, Danielle Shirley	DEFS005957 -61	Email correspondence providing draft response to DOL	Work Product, Attorney-Client
10/14/2010	Sam DeLeon	William Johnson, Sam DeLeon, Robert Wonnell	DEFS005962 -64	Email correspondence providing draft response to DOL	Work Product, Attorney-Client
10/14/2010	Juanita Hill	Sam DeLeon, Carl Gallagher, Robert Wonnell, Danielle Shirley, Debi Massey	DEFS005965 -67	Email correspondence providing draft DOL response for review and comment	Work Product, Attorney-Client
10/13/2010	Danielle Shirley	Mail Journal	DEFS005968	Email read notification	Attorney-Client
10/13/2010	Robert Wonnell	Mail Journal	DEFS005969	Email read notification	Attorney-Client
10/12/2010	Sam DeLeon	Robert Wonnell, Sam DeLeon, Debi Massey, Danielle Shirley	DEFS005970 -86	Email correspondence providing information related to ethics complaint	Work Product, Attorney-Client

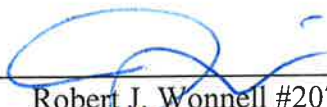
9/27/2010	Robert Wonnell	Mail Journal	DEFS005987	Email read notification	Attorney-Client
9/24/2010	Sam DeLeon	Jane Sieve-Wilson, Stephanie Sestrich, Sam DeLeon, Debi Massey	DEFS005988-5999	Email communication providing feedback of document drafted for discovery response in litigation	Work Product, Attorney-Client
9/24/2010	Stephanie Sestrich	Sam DeLeon	DEFS006000-10	Email communication providing information for discovery response in litigation	Work Product, Attorney-Client
9/24/2010	Sam DeLeon	Stephanie Sestrich, Sam DeLeon	DEFS006011-22	Email communication regarding information requested by counsel in litigation	Work Product, Attorney-Client
9/24/2010	Carl Gallagher	Mail Journal	DEFS006023	Email read notification	Attorney-Client
9/24/2010	Sam DeLeon	Robert Wonnell Carl Gallagher, Jane Sieve-Wilson	DEFS0060242	Email communication discussing communication from Snyder	Attorney-Client
9/24/2010	Robert Wonnell	Sam DeLeon, Carl Gallagher, Jane Sieve-Wilson	DEFS006025	Email communication discussing communication from Snyder	Attorney-Client
9/24/2010	Robert Wonnell	Mail Journal	DEFS006026	Email read notification	Attorney-Client
9/23/2010	Carl Gallagher	Mail Journal	DEFS006033	Email read notification	Attorney-Client
9/23/2010	Sam DeLeon	Carl Gallagher, Robert Wonnell, Jane Sieve-Wilson, Sam DeLeon	DEFS006035-37	Email correspondence discussing Snyder comments	Attorney-Client
9/23/2010	Sam DeLeon	Sam DeLeon	DEFS006034	Partially redacted, email read notification	Attorney-Client
9/22/2010	Sam DeLeon	Robert Wonnell, Jane Sieve-Wilson, Sam DeLeon	DEFS006038-6048	Email correspondence providing information requested for litigation	Work Product, Attorney-Client
9/22/2010	Carl Gallagher	Mail Journal	DEFS006049	Email read notification	Attorney-Client

9/22/2010	Robert Wonnell	Mail Journal	DEFS006050	Email read notification	Attorney-Client
9/22/2010	Danielle Shirley	Mail Journal	DEFS006051	Email read notification	Attorney-Client
9/22/2010	Sam DeLeon	Robert Wonnell, Sam DeLeon, Debi Massey, Danielle Shirley, Jane Sieve-Wilson, Carl Gallagher	DEFS006052-57	Email communication discussing Snyder complaint and other litigation	Work Product, Attorney-Client
9/22/2010	Jody Boeding	Mail Journal	DEFS006058	Email read notification	Attorney-Client
9/22/2010	Sam DeLeon	Jody Boeding, Sam DeLeon	DEFS006059-60	Email correspondence discussing Snyder complaint response	Work Product, Attorney-Client
9/22/2010	Jody Boeding	Sam DeLeon	DEFS006061	Email correspondence discussing Snyder complaint response	Work Product, Attorney-Client
9/22/2010	Jody Boeding	Mail Journal	DEFS006062	Email read notification	Attorney-Client
9/22/2010	Sam DeLeon	Jody Boeding, Sam DeLeon	DEFS006063-66	Email correspondence discussing Snyder complaint and DOL investigation	Work Product, Attorney-Client
7/23/2010	Carl Gallagher	Mail Journal	DEFS006129	Email read notification	Attorney-Client
7/23/2010	Robert Wonnell	Mail Journal	DEFS006130	Email read notification	Attorney-Client
7/23/2010	Sam DeLeon	Robert Wonnell, Carl Gallagher, Sam DeLeon	DEFS006131-32	Email communication discussing letter sent by Snyder	Attorney-Client
7/8/2010	Danielle Shirley	Mail Journal	DEFS006137	Email read notification	Attorney-Client
7/8/2010	Robert Wonnell	Mail Journal	DEFS006138	Email read notification	Attorney-Client
7/8/2010	Carl Gallagher	Mail Journal	DEFS006139	Email read notification	Attorney-Client
7/8/2010	Sam DeLeon	Robert Wonnell,	DEFS006140-41	Email correspondence discussing termination	Attorney-Client

		Danielle Shirley, Debi Massey, Carl Gallagher, Sam DeLeon		of Snyder	
7/7/2010	Robert Wonnell	Sam DeLeon, Danielle Shirley, Debi Massey, Carl Gallagher	DEFS006142-43	Email correspondence discussing termination of Snyder	Attorney-Client
7/7/2010	Robert Wonnell	Mail Journal	DEFS006144	Email read notification	Attorney-Client
7/7/2010	Sam DeLeon	Sam DeLeon	DEFS006145	Partially redact, email read notification	Attorney-Client
7/7/2010	Sam DeLeon	Robert Wonnell, Sam DeLeon	DEFS006146-48	Email correspondence discussing potential termination of Snyder	Attorney-Client

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 30th day of July 2013, the foregoing was served electronically upon:

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Attorney for Plaintiff

A handwritten signature in blue ink is written over a horizontal line. The signature is stylized, starting with a large loop and ending with a short horizontal stroke.