

EXHIBIT 1 to SPECIAL MASTER'S REPORT AND RECOMMENDATIONS OF JUNE 4, 2007

Lee v. State Farm

**ATTORNEY/CLIENT AND WORK PRODUCT
REVISED PRIVILEGE LOG
SEAMAN, GIOMETTI & MURPHY, P.C. FILES**

DOCUMENT NUMBER	BATES NUMBER (SEAMAN)	NATURE OF DOCUMENT, COMMUNICATION OR OTHER MATERIAL	DATE OF ORIGIN	REASON FOR NOT PRODUCING OR NOT DISCLOSING	CONTENTS PRIVILEGED/N ON
1.	0001-0002	Letter from Tom Seaman, to Jon Sands enclosing Seaman, Giometti, & Murphy, P.C. (SGM) billing statements	07/22/05	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose</u> ; CFE & ID

2.	0012- 0070	SGM Billing Statements	07/21/05; 11/02/04; 08/31/04; 05/31/04; 02/29/04; 08/31/03; 06/30/03; 04/30/03; 02/28/03; 01/31/03; 12/31/02; 11/30/02; 10/31/02; 08/31/02; 07/31/02	Attorney/Client Privilege and Work Product as it is a communication from State Farm's legal counsel to State Farm representatives. Redacted 07/31/02 statement (6/17/02 through 07/30/02) has been produced – see Bates Nos. 0007 - 0011.	<u>Disclose;</u> ID, AI & ID
3.	0079-0080	Fax Cover Sheets from Greg Giometti to Steve Baird, Auto Team Manager	08/13/02	Attorney/Client Privilege as it is a communication from State Farm's legal counsel to State Farm representatives.	<u>Disclose;</u> ID

4.	0087; 0165; 0187; 0197; 0201; 0324; 0327; 0334; 0339; 0362; 0364; 0415; 0431; 0478; 0492; 0497; 0510; 0573; 0590; 0593; 0622; 0628; 0647; 0681; 0694; 0711; 0758; 0768; 0785; 0794; 0896; 0929; 0977; 0993; 1102; 1162; 1314; 1331; 1411; 1490; 1642; 1644; 1681; 1710; 1714; 1753; 1761; 1763; 1765; 1841; 1853; 1855; 1858; 1864;	SGM bcc pages to State Farm representatives and/or legal counsel attached to miscellaneous correspondence from SGM to third parties	Multiple dates after 09/17/02	Attorney/Client Privilege as it is a communication from State Farm's legal counsel to State Farm representatives.	<u>Disclose;</u> ID
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5.	0091-0098	Letter from Greg Giometti to Dave Eaton, Auto Claim Consultant, re: status of litigation and fax cover sheets	08/07/02	Attorney/Client Privilege and Work Product as it is a communication from State Farm's legal counsel to State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> AI
6.	0105-0116	Letter from Greg Giometti to Dave Eaton re: status of litigation and legal opinion	07/19/02	Attorney/Client Privilege and Work Product as it is a communication from State Farm's legal counsel to State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE & AI

7.	0117-0131	Letter from Greg Giometti to Dave Eaton re: status of litigation and legal opinion and fax cover sheets	07/17/02	Attorney/Client Privilege and Work Product as it is a communication from State Farm's legal counsel to State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE & AI
8.	0136-0138	Fax Cover Sheet from Tom Seaman to Dave Eaton and Brian Arakaki, Auto Section Manager	07/15/02	Attorney/Client Privilege as it is a communication from State Farm's legal counsel to State Farm representatives.	<u>Disclose;</u> ID
9.	0169-0171; 0997-1001; 1031-1033; 1757-1759; 1984-1986; 2032-2034; 2075; 2149; 2151-2152; 2387-2389;	Fax Cover Sheets from SGM to State Farm legal counsel and/or State Farm representatives	Multiple dates after 09/17/02	Attorney/Client Privilege as it is a communication from State Farm's legal counsel to State Farm representatives.	<u>Disclose;</u> ID

10.	0139-0158	Fax Cover Sheet from Steve Baird to Greg Giometti and attached documents	07/11/02	Attorney/Client Privilege as it is a communication from State Farm representatives to State Farm's legal counsel.	<u>Disclose;</u> ID & CFE
11.	0159-0162	Fax Cover Sheet from Steve Baird to Greg Giometti and attached documents	07/11/02	Attorney/Client Privilege as it is a communication from State Farm representatives to State Farm's legal counsel.	<u>Disclose;</u> CFE & ID
12.	0180-0184	Letter from Tom Seaman to Dave Eaton re: status of litigation and fax cover sheets	07/09/02	Attorney/Client Privilege and Work Product as it is a communication from State Farm's legal counsel to State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE & AI

13.	0192-0194	Letter from Tom Seaman to Dave Eaton re: status of litigation	07/03/02	Attorney/Client Privilege and Work Product as it is a communication from State Farm's legal counsel to State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE & AI
14.	0345-0348	Fax Cover Sheet from Toni Hilton, secretary for Brian Arakaki, to Mary Frangis with attached documents	10/14/02	Attorney/Client Privilege as it is a communication from State Farm representatives to State Farm's legal counsel.	<u>Disclose;</u> ID

15.	0351	E-Mail from Tom Seaman to Richard Schulkins, Counsel for State Farm	10/11/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
16.	0359	E-Mail from Richard Schulkins to Michele Mancias, Attorney for State Farm and copied to Tom Seaman	10/11/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P

17.	0360	E-Mail from Richard Schulkins to Tom Seaman	10/11/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
18.	0365-0376	Fax Cover Sheet from Tom Seaman to Richard Schulkins, Michelle Mancias and Brian Arakaki with attached documents	10/09/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel and State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE

19.	0377-0390	Fax Cover Sheet from Tom Seaman to Richard Schulkins, Michelle Mancias and Brian Arakaki with attached documents	10/09/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel and State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE
20.	0391-0400	Fax Cover Sheet from Tom Seaman to Richard Schulkins and Brian Arakaki with attached documents	10/08/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel and State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P

21.	0401-0405	Fax Cover Sheet from Richard Schulkins to Tom Seaman with attached documents	10/07/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE & AI
22.	0406-0407	E-Mail from Richard Schulkins to Tom Seaman	10/07/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P

23.	0408-0409	Fax Cover Sheet from Tom Seaman to Richard Schulkins, Michelle Mancias and Brian Arakaki	10/04/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel and State Farm representatives.	<u>Disclose;</u> ID
24.	0410-0412	Fax Cover Sheet from Tom Seaman to Richard Schulkins, Michelle Mancias and Brian Arakaki	10/04/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel and State Farm representatives.	<u>Disclose;</u> ID
25.	0416	Letter from Greg Giometti to Richard Schulkins	10/02/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
26.	0420-0421	E-Mail from Richard Schulkins to State Farm attorneys	10/01/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel and is unrelated to this case.	<u>Not Disclosed;</u> P

27.	0424	Letter from Tom Seaman to Richard Schulkins	09/30/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
28.	0428	E-Mail from Richard Schulkins to Brian Arakaki and copied to Tom Seaman	09/30/02	Attorney/Client Privilege as it is a communication from State Farm's legal counsel to State Farm representatives.	<u>Not Disclosed;</u> P
29.	0432-0439	Fax Cover Sheet from Tom Seaman to Richard Schulkins and Brian Arakaki with attached documents	09/27/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel and State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE

30.	0440-0447	Letter from Tom Seaman to Richard Schulkins re: status of litigation with attached FedEx receipt	09/27/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE & AI
31.	0452-0453	Letter from Tom Seaman to Richard Schulkins re: status of litigation	09/26/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
32.	0464	Letter from Tom Seaman to Richard Schulkins	09/24/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID

33.	0468-0469	Letter from Tom Seaman to Richard Schulkins re: status of litigation	09/23/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> AI
34.	0482	Letter from Tom Seaman to Richard Schulkins	09/19/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
35.	0483-0484	Letter from Tom Seaman to Richard Schulkins re: status of litigation	09/18/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID

36.	0486-0488	Fax Cover Sheet from Tom Seaman to Richard Schulkins re: status of litigation	09/17/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
37.	0498-0502	Fax Memo from Richard Schulkins to Greg Giometti with attached documents	09/04/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> AI

38.	0503-0504	Letter from Tom Seaman to Richard Schulkins re: status of litigation	09/04/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
39.	0505	Letter from Tom Seaman to Richard Schulkins	09/03/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
40.	0511-0512	Fax Memo from Richard Schulkins to Greg Giometti	08/22/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> AI

41.	0513-0519	Fax Cover Sheet from Greg Giometti to Richard Schulkins with attached documents and fax cover sheets	08/21/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> AI
42.	0520-0524	Letter from Greg Giometti to Richard Schulkins re: status of litigation and FedEx receipt	08/16/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE & AI

43.	0525-0531	Fax Cover Sheet from Karl Chambers to Dave Eaton and Brian Arakaki with attached documents	08/16/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel and State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> AI
44.	0533	E-Mail from Brian Arakaki to Richard Schulkins and copied to Tom Seaman and Jon Sands	01/31/03	Attorney/Client Privilege as it is a communication from State Farm representatives to State Farm's legal counsel.	<u>Disclose;</u> ID
45.	0534	E-Mail from Richard Schulkins to Dave Eaton and copied to Tom Seaman, Jon Sands and Brian Arakaki	01/31/03	Attorney/Client Privilege as it is a communication from State Farm's legal counsel to State Farm representatives.	<u>Disclose;</u> ID

46.	0535-0542	Fax Cover Sheet from Tom Seaman to Richard Schulkins and Jon Sands with attached documents and fax cover sheets	01/31/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose</u> ; CFE & AI
47.	0546-0547	Fax Cover Sheet from Terri Taylor, secretary for Tom Seaman, to Richard Schulkins	01/29/03	Attorney-Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose</u> ; ID
48.	0548-0553	Fax Cover Sheet from Steve Baird to Tom Seaman with attached documents	01/29/03	Attorney/Client Privilege as it is a communication from State Farm representatives to State Farm's legal counsel.	<u>Disclose</u> ; CFE & AI

49.	0561-0565	Letter from Tom Seaman to Jon Sands re: status of litigation with attached fax cover sheets	01/27/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose</u> ; CFE & AI
50.	0566-0567	Fax Cover Sheet from Greg Giometti to Richard Schulkins	01/27/03	Attorney-Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose</u> ; ID
51.	0568-0571	Fax Cover Sheet from Greg Giometti to Richard Schulkins with attached documents and fax cover sheets	01/27/03	Attorney-Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose</u> ; CFE & AI

52.	0574	Fax Cover Sheet from Joseph Nistico, Nistico & Crouch, attorney representing State Farm, to David Murphy	01/24/03	Attorney-Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
53.	0575-0579	Fax Cover Sheet from Ross Pulkrabek, Faegre & Benson, attorney representing State Farm, to Tom Seaman with attached documents	01/24/03	Attorney-Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
54.	0580-0583	Fax Cover Sheet from David Murphy to Joseph Nistico with attached documents and fax cover sheets	01/24/03	Attorney-Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
55.	0633-0634	Fax Cover Sheet from Greg Giometti to Richard Schulkins	01/21/03	Attorney-Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID

56.	0635-0636	Fax Cover Sheet from Michelle Mancias to Greg Giometti with attached correspondence	01/20/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE & AI
57.	0640	Letter from Michelle Mancias to Greg Giometti	01/20/03	Attorney-Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
58.	0641-0644	Fax Cover Sheet from Michelle Mancias to Greg Giometti with attached documents	01/20/03	Attorney-Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> AI

59.	0645	E-Mail from Richard Schulkins to Greg Giometti	01/17/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
60.	0664	Letter from Greg Giometti to Michelle Mancias	01/17/03	Attorney-Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
61.	0668-0679	Fax Memo from Richard Schulkins to Greg Giometti with attached documents	01/17/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P

62.	0701-0704	Fax Cover Sheet from Terri for Tom Seaman to Steve Baird with attached documents and fax cover sheets	01/14/03	Attorney-Client Privilege as it is a communication between State Farm's legal counsel and State Farm representatives.	<u>Disclose;</u> ID
63.	0713-0718	Fax Cover Sheet from Greg Giometti to Steve Baird with attached documents and fax cover sheets	01/10/03	Attorney-Client Privilege as it is a communication between State Farm's legal counsel and State Farm representatives.	<u>Disclose;</u> AI
64.	0719-0724	Letter from Greg Giometti to Richard Schulkins re: status of litigation with attached fax cover sheets	01/10/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE, AI & ID

65.	0728-0735	Letter from Greg Giometti to Richard Schulkins re: status of litigation with attached fax cover sheets	01/10/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose</u> ; CFE, AI & ID
66.	0748	Letter from Steve Baird to Greg Giometti	01/06/03	Attorney/Client Privilege as it is a communication from State Farm representatives to State Farm's legal counsel.	<u>Disclose</u> ; ID
67.	0749	Letter from Tom Seaman to Richard Schulkins	01/08/02	Attorney-Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose</u> ; ID

68.	0750-0751	Letter from Tom Seaman to Steve Baird	01/08/02	Attorney/Client Privilege as it is a communication from State Farm's legal counsel to State Farm representatives.	<u>Disclose;</u> ID
69.	0752-0753	E-Mail from Marlene Beliveau, Faegre & Benson, to Paula O'Konski, secretary for Greg Giometti	01/08/03	Attorney-Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
70.	0755	Letter from Steve Baird to Tom Seaman	01/06/03	Attorney/Client Privilege as it is a communication from State Farm representatives to State Farm's legal counsel.	<u>Disclose;</u> ID
71.	0761-0762	Letter from Steve Baird to Greg Giometti with attached fax sheet	01/06/03	Attorney/Client Privilege as it is a communication from State Farm representatives to State Farm's legal counsel.	<u>Disclose;</u> ID

72.	0797-0801	Fax Cover Sheet from Michelle Mancias to Greg Giometti and Karl Chambers with attached documents	01/02/02	Attorney-Client Privilege as it is a communication between State Farm's legal counsel.	<u>Not Disclosed;</u> P
73.	0802-0806	Letter from Greg Giometti to Brian Arakaki re: status of litigation with attached fax cover sheets	01/02/02	Attorney/Client Privilege and Work Product as it is a communication from State Farm's legal counsel to State Farm representatives.	<u>Not Disclosed;</u> P
74.	0808-0811	Fax Cover Sheet from Terri Taylor to Jon Sands, Richard Schulkins and Brian Arakaki with attached fax cover sheets	03/28/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel and State Farm representatives.	<u>Disclose;</u> ID
75.	0812-0815	Fax Cover Sheet from Terri Taylor to Jon Sands, Richard Schulkins and Brian Arakaki with attached fax cover sheets	03/27/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel and State Farm representatives.	<u>Disclose;</u> ID

76.	0818-0826	Fax Cover Sheet from Jon Sands to Tom Seaman with attached documents	03/17/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID & AI
77.	0827-0839	Fax Cover Sheet from Jon Sands to Tom Seaman with attached documents	03/17/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID & AI

78.	0840-0847	Fax Cover Sheet from Jon Sands to Tom Seaman with attached documents	03/14/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID & AI
79.	0848-0859	Letter from Tom Seaman to Jon Sands with attached documents and fax cover sheets	03/14/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE, AI & ID

80.	0860-0863	Fax Cover Sheet from Terri Taylor to Jon Sands, Richard Schulkins and Brian Arakaki	03/11/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel and State Farm representatives.	<u>Disclose;</u> ID
81.	0864-0867	Fax Cover Sheet from Terri Taylor to Jon Sands, Richard Schulkins and Brian Arakaki	03/10/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel and State Farm representatives.	<u>Disclose;</u> ID
82.	0868-0871	Fax Cover Sheet from Terri Taylor to Jon Sands, Richard Schulkins and Brian Arakaki	03/06/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel and State Farm representatives.	<u>Disclose;</u> ID

83.	0872-0874	Fax Cover Sheet from Tom Seaman to Richard Schulkins and Brian Arakaki	03/06/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel and State Farm representatives.	<u>Disclose;</u> ID
84.	0875-0878	Fax Cover Sheet from Tom Seaman to Jon Sands, Richard Schulkins and Brian Arakaki	03/06/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel and State Farm representatives.	<u>Disclose;</u> ID
85.	0883-0886	Fax Cover Sheet from Terri Taylor to Jon Sands, Richard Schulkins and Brian Arakaki	03/03/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel and State Farm representatives.	<u>Disclose;</u> ID

86.	0891-0894	Fax Cover Sheet from Tom Seaman to Jon Sands, Richard Schulkins and Brian Arakaki	02/27/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel and State Farm representatives.	<u>Disclose;</u> ID
87.	0897	Letter from Kim Sutherland, paralegal for Jon Sands, to Tom Seaman	02/25/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
88.	0900-0901	Fax Cover Sheet from Terri Taylor to Diane, secretary for Richard Schulkins	02/25/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
89.	0902	Letter from Tom Seaman to Richard Schulkins	02/24/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID

90.	0907	E-Mail from Richard Schulkins to Tom Seaman re: status of litigation	02/21/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE & AI
91.	0908	E-Mail from Richard Schulkins to Tom Seaman	02/21/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID
92.	0909-0912	Letter from Tom Seaman to Jon Sands with attached documents	02/19/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID

93.	0915-0926	E-Mail from Jon Sands to Tom Seaman with attached documents and handwritten notes of Tom Seaman	02/14/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE & AI
94.	0934-0943	Fax Cover Sheet from Tom Seaman to Jon Sands with attached documents and fax cover sheets	02/12/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE & AI

95.	0956-0970	Fax Cover Sheet from Tom Seaman to Jon Sands with attached documents and fax cover sheets	02/11/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID
96.	0972-0974	Fax Cover Sheet from Terri Taylor to Richard Schulkins and Jon Sands	02/10/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID

97.	0983-0990	Fax Cover Sheet from Greg Giometti to Richard Schulkins, Jon Sands and Brian Arakaki with attached documents and fax cover sheets	02/10/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel and State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE, AI & ID The SM notes that counsel included Bates no.0997-1001 in the materials without including same in the PL. They are hereby; Disclosed; ID
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98.	1006-1011	Fax Cover Sheet from Tom Seaman to Richard Schulkins and Jon Sands with attached documents and fax cover sheets	02/07/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclosed;</u> ID The SM notes that counsel included Bates nos.1031-1033 in the materials without including same in the PL. They are hereby; Disclosed; ID
99.	1034-1042	Fax Cover Sheet from Tom Seaman to Jon Sands and Richard Schulkins with attached documents and fax cover sheets	02/07/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> AI & ID

100.	1043	E-Mail from Richard Schulkins to Jon Sands, David Murphy and Tom Seaman	02/07/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
101.	1044-1051	E-Mail from Jon Sands to Richard Schulkins, David Murphy and Tom Seaman with attached documents	02/07/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE, AI & ID

102.	1052-1065	Fax Cover Sheet from Jon Sands to Tom Seaman with attached documents	02/06/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID
103.	1066-1072	Fax Cover Sheet from Tom Seaman to Richard Schulkins and Jon Sands with attached documents and fax cover sheets	02/06/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID

104.	1073-1079	E-Mail from Jon Sands to Richard Schulkins, David Murphy and Tom Seaman with attached documents	02/06/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> AI
105.	1080-1084	Fax Cover Sheet from Tom Seaman to Richard Schulkins and Jon Sands with attached documents and fax cover sheets	02/06/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> AI & ID

106.	1087-1090	Fax Cover Sheet from Tom Seaman to Richard Schulkins and Jon Sands re: status of litigation with attached fax cover sheets	02/05/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID
107.	1091-1093	Fax Cover Sheet from Tom Seaman to Richard Schulkins and Jon Sands with attached fax cover sheets	02/05/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
108.	1094-1096	Fax Cover Sheet from Tom Seaman to Richard Schulkins and Jon Sands	02/04/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	1094 <u>Not Disclosed;</u> P 1095-1096 <u>Disclose;</u> ID

109.	1097-1098	Letter from Greg Giometti to Richard Schulkins	02/04/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
110.	1099-1100	Fax Cover Sheet from Greg Giometti to Richard Schulkins	02/04/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
111.	1110	E-Mail from Richard Schulkins to Tom Seaman and David Murphy	06/23/04	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P

112.	1111-1115	E-Mail from Richard Schulkins to Tom Seaman and David Murphy with attached documents	06/08/04	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID
113.	1116-1118	Fax Cover Sheet from Richard Schulkins to Tom Seaman with attached documents	04/08/04	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
114.	1119	E-Mail from Richard Schulkins to Tom Seaman	03/19/04	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID

115.	1120	E-Mail from Richard Schulkins to Tom Seaman	03/19/04	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> AI
116.	1122-1123	Fax Cover Sheet from Tom Seaman to Richard Schulkins	02/24/04	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
117.	1124-1137	E-Mail from Richard Schulkins to Jon Sands, Tom Seaman and David Murphy with attached documents	02/20/04	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P

118.	1138-1139	Fax Cover Sheet from Terri Taylor to Richard Schulkins with attached fax cover sheets	02/17/04	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID
119.	1140-1141	Fax Cover Sheet from Tom Seaman to Richard Schulkins with attached fax cover sheets	02/13/04	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
120.	1142-1144	Fax Cover Sheet from Tom Seaman to Richard Schulkins and Jon Sands with attached fax cover sheets	02/09/04	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID

121.	1145-1150	Letter from Tom Seaman to Richard Schulkins re: status of litigation and attached fax cover sheets	02/05/04	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	1145-1146 <u>Not Disclosed;</u> P 1147-1150 <u>Disclose;</u> ID
122.	1151-1153	Fax Cover Sheet from Terri Taylor to Richard Schulkins and Jon Sands with attached fax cover sheets	07/29/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
123.	1154-1156	Fax Cover Sheet from Terri Taylor to Richard Schulkins and Jon Sands with attached fax cover sheets	07/21/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
124.	1157	E-Mail from Richard Schulkins to Tom Seaman	07/11/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Not Disclosed;</u> P

125.	1158-1161	Fax Cover Sheet from Tom Seaman to Jon Sands with attached fax cover sheets	07/08/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
126.	1163	E-Mail from Richard Schulkins to Jon Sands	07/07/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Not Disclosed;</u> P
127.	1164-1168	Fax Cover Sheet from Tom Seaman to Jon Sands with attached documents	07/07/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	1166-1168 <u>Not Disclosed;</u> P 1164-1165 <u>Disclose;</u> ID

128.	1169-1181	Fax Cover Sheet from Tom Seaman to Brian Arakaki with attached documents and fax cover sheets	07/07/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel and State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID
129.	1182-1197	Fax Cover Sheet from Tom Seaman to Jon Sands, Richard Schulkins and Brian Arakaki with attached documents and fax cover sheets	06/30/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel and State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID

130.	1198-1200	Fax Cover Sheet from Terri Taylor to Richard Schulkins and Jon Sands with attached fax cover sheets	06/26/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
131.	1201-(1221) <i>1219</i>	E-Mail from Jon Sands to Richard Schulkins and Tom Seaman with attached documents	06/19/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE, AI & ID
132.	1220-1221	Letter from Tom Seaman to Jon Sands	07/17/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P

133.	1223-1260	Fax Cover Sheet from Tom Seaman to Jon Sands with attached documents and fax cover sheets	06/13/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE & AI
134.	1261	E-Mail from Richard Schulkins to Tom Seaman and Jon Sands	06/13/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P

135.	1262	E-Mail from Richard Schulkins to Jon Sands and Tom Seaman	06/13/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
136.	1263	Fax Cover Sheet from Jon Sands to Tom Seaman	06/13/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
137.	1265-1267	Fax Cover Sheet from Tom Seaman to Richard Schulkins and Jon Sands with attached fax cover sheets	05/16/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
138.	1268-1270	Fax Cover Sheet from Terri Taylor to Richard Schulkins and Jon Sands with attached fax cover sheets	05/15/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID

139.	1272-1288	Fax Cover Sheet from Jon Sands to Richard Schulkins and Tom Seaman	05/08/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
140.	1290-1292	Fax Cover Sheet from Tom Seaman to Richard Schulkins and Jon Sands with attached fax cover sheets	05/02/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
141.	1293-1295	Fax Cover Sheet from Tom Seaman to Richard Schulkins and Jon Sands with attached fax cover sheets	05/02/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE, AI & ID

142.	1296-1303	Fax Cover Sheet from Jon Sands to Richard Schulkins and Tom Seaman with attached documents	05/01/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE
143.	1304-1312	Fax Cover Sheet from Jon Sands to Richard Schulkins and Tom Seaman with attached documents	04/30/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE & ID

144.	1315-1318	Fax Cover Sheet from Tom Seaman to Jon Sands, Richard Schulkins and Brian Arakaki with attached fax cover sheets	04/28/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel and State Farm representatives.	<u>Disclose;</u> ID
145.	1319-1321	Fax Cover Sheet from Tom Seaman to Richard Schulkins and Brian Arakaki with attached fax cover sheets	04/28/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel and State Farm representatives.	<u>Disclose;</u> ID
146.	1332-1334	Fax Cover Sheet from Tom Seaman to Richard Schulkins and Brian Arakaki with attached fax cover sheets	04/15/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel and State Farm representatives.	<u>Disclose;</u> ID

147.	1335-1340	E-Mail from Jon Sands to Richard Schulkins and Tom Seaman with attached documents	04/23/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE & ID
148.	1341-1350	Letter from Tom Seaman to Jon Sands with attached documents	04/22/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID
149.	1351	Letter from Kim Sutherland, paralegal for Jon Sands, to Tom Seaman	04/21/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID

150.	1354	E-Mail from Richard Schulkins to Tom Seaman	04/18/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> CFE & ID
151.	1355-1362	Letter from Tom Seaman to Richard Schulkins and Jon Sands re: status of litigation with attached fax cover sheets	04/17/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE & ID
152.	1363-1372	Fax Cover Sheet from Jon Sands to Richard Schulkins and Tom Seaman with attached documents	04/16/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE & ID

153.	1373-1387	Fax Cover Sheet from Tom Seaman to Richard Schulkins and Jon Sands with attached documents and fax cover sheets	04/09/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE & ID
154.	1412-1417	Fax Cover Sheet from Tom Seaman to Jon Sands and Richard Schulkins with attached documents and fax cover sheets	05/20/05	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
155.	1418	E-Mail from Jon Sands to Richard Schulkins and Tom Seaman	05/17/05	Attorney/Client Privilege as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P

156.	1419	E-Mail from Richard Schulkins to Tom Seaman and Jon Sands	05/17/05	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Not Disclosed;</u> P
157.	1420-1421	E-Mail from Jon Sands to Richard Schulkins, Tom Seaman, Susan Singleton, Auto Section Manager, and Dave Eaton re: status of litigation	05/16/05	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel and State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE

158.	1422-1434	E-Mail from Jon Sands to Richard Schulkins and Tom Seaman with attached documents	05/13/05	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE & ID
159.	1435-1461	E-Mail from Jon Sands to Richard Schulkins, Tom Seaman and Dave Eaton with attached documents	05/04/05	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel and State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P

160.	1462-1465	E-Mail from Jon Sands to Richard Schulkins, Dave Eaton and Tom Seaman with attached documents	05/04/05	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel and State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
161.	1466-1467	E-Mail from Diane Adams, secretary for Richard Schulkins, to Richard Schulkins, Carley Cross, paralegal for Jon Sands, Jon Sands and Terri Taylor	05/04/05	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID

162.	1468	E-Mail from Richard Schulkins to Tom Seaman, Dave Eaton and Jon Sands	05/04/05	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel and State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
163.	1469-1478	Fax Cover Sheet from Tom Seaman to Jon Sands with attached documents and fax cover sheets	05/03/05	Attorney/Client Privilege as it is a communication between State Farm's legal counsel and State Farm representatives.	<u>Disclose;</u> ID
164.	1479	E-Mail from Diane Adams to Terri Taylor	05/03/05	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID

165.	1480	E-Mail from Jon Sands to Richard Schulkins and Tom Seaman	04/29/05	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
166.	1481	E-Mail from Richard Schulkins to Jon Sands and Tom Seaman	04/28/05	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P

167.	1484-1486	E-Mail from Richard Schulkins to Tom Seaman and Jon Sands with attached documents	12/10/04	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
168.	1487-1488	Fax Cover Sheet from Tom Seaman to Richard Schulkins with attached fax cover sheets	12/10/04	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
169.	1491-1492	Fax Cover Sheet from Tom Seaman to Richard Schulkins with attached fax cover sheets	08/09/04	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID

170.	1493-1498	Letter from Tom Seaman to Richard Schulkins re: status of litigation with attached fax cover sheets	08/02/04	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
171.	1499-1501	Letter from Tom Seaman to Marilyn Smith, Auto Team Manager, re: status of litigation <i>and copied to Jon Sands, Brian Arakaki and Richard Schulkins</i>	08/02/04	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel and State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID

172.	1502	Letter from David Murphy to Brian Arakaki, Steve Baird and Richard Schulkins	07/26/04	Attorney/Client Privilege as it is a communication between State Farm's legal counsel and State Farm representatives.	<u>Disclose;</u> ID
173.	1504	Letter from David Murphy to Brian Arakaki, Steve Baird and Richard Schulkins	07/14/04	Attorney/Client Privilege as it is a communication between State Farm's legal counsel and State Farm representatives.	<u>Disclose;</u> ID
174.	1506	E-Mail from David Murphy to Richard Schulkins and Tom Seaman	07/14/04	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P

175.	1507-1518	E-Mail from David Murphy to Richard Schulkins, Jon Sands and Tom Seaman with attached documents	07/12/04	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
176.	1519-1520	E-Mail from Richard Schulkins to David Murphy	07/07/04	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P

177.	1521-1522	Fax Cover Sheet from David Murphy to Richard Schulkins, Jon Sands and Brian Arakaki	07/06/04	Attorney/Client Privilege as it is a communication between State Farm's legal counsel and State Farm representatives.	<u>Disclose;</u> ID
178.	1523-1524	Fax Cover Sheet from David Murphy to Richard Schulkins, Jon Sands and Brian Arakaki	07/06/04	Attorney/Client Privilege as it is a communication between State Farm's legal counsel and State Farm representatives.	<u>Disclose;</u> ID
179.	1525-1538	Letter from Carley Cross to Dave Murphy with attached documents	07/02/04	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
180.	1539-1601	Letter from Carley Cross to Tom Seaman with attached documents	07/02/04	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID

181.	1602-1607	Fax Cover Sheet from Dave Murphy to Jon Sands with attached documents	07/02/04	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
182.	1610	Letter from Tom Seaman to Richard Schulkins	11/15/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
183.	1615-1640	Unredacted Activity Log Notes from Thorne Claim File attached to letter from Kathryn Phillips-Schwab, paralegal for Robert Baldwin, to Tom Seaman dated 11/13/02	Various	Attorney/Client Privilege as they include communications between Mr. Thorne and his attorney, John Rodman.	<u>Disclose;</u> ID
184.	1645-1647	Fax Cover Sheet from Greg Giometti to Richard Schulkins with attached fax cover sheets	11/14/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID

185.	1648-1651	Fax Memo from Richard Schulkins to Eric Miller, Auto Section Manager, and Greg Giometti	11/14/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel and State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
186.	1652-1654	Fax Memo from Richard Schulkins to Greg Giometti	11/14/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P

187.	1655	Fax Memo from Richard Schulkins to Greg Giometti	11/14/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
188.	1656-1673	Fax Cover Sheet from Greg Giometti to Richard Schulkins with attached documents	11/13/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID

189.	1674-1675	Fax Memo from Richard Schulkins to Greg Giometti	11/12/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
190.	1676-(1681) 1678	Fax Memo from Richard Schulkins to Greg Giometti	11/12/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> AI & ID

191.	1722-1725	Fax Cover Sheet from Tom Seaman to Dyann Schieltz, Auto Claim Representative, with attached documents and fax cover sheets	11/08/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel and State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
192.	1726-1727	Fax Cover Sheet from Tom Seaman to Dyann Schieltz and fax cover sheets	11/06/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel and State Farm representatives.	<u>Disclose;</u> ID

193.	1731-1746	Letter from Greg Giometti to Richard Schulkins with attached documents	11/06/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> AI & ID
194.	1767-1770	Fax Cover Sheet from Tom Seaman to Richard Schulkins, Brian Arakaki and Michelle Mancias with attached fax cover sheets	10/31/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel and State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID

195.	1772-1785	Fax Cover Sheet from Karl Chambers to Richard Schulkins with attached documents and fax cover sheets	10/28/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID
196.	1786-1794	Fax Memo from Richard Schulkins to Karl Chambers with attached document	10/28/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE, AI & ID

197.	1795-1796	Fax Memo from Richard Schulkins to Karl Chambers with attached documents	10/26/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE, AI & ID
198.	(1799) 1797-1798	Fax Memo from Richard Schulkins to Karl Chambers with attached documents	10/26/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE, AI & ID

199.	1799	E-Mail from Richard Schulkins to Tom Seaman	10/26/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
200.	1800-1813	Fax Cover Sheet from Karl Chambers to Richard Schulkins with attached documents	10/25/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE, AI & ID

201.	1814	E-Mail from Richard Schulkins to Tom Seaman and David Murphy	10/24/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID
202.	1819-1820	Letter from Tom Seaman to Richard Schulkins re: status of litigation	10/23/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID

203.	1821-1826	Letter from Tom Seaman to Susan West, Auto Claim Representative	10/23/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel and State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
204.	1827-1832	Letter from Tom Seaman to Dyann Schieltz	10/23/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel and State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P

205.	1833-1838	Letter from Tom Seaman to Deb Plouffe, Auto Claim Representative	10/23/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel and State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
206.	1846-1853	Letter from Tom Seaman to Steve Baird	10/22/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel and State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P

207.	1870-1873	E-Mail from Richard Schulkins to Tom Seaman with attached documents	10/20/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose</u> ; CFE, AI
208.	1874	Letter from Tom Seaman to Richard Schulkins	10/18/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose</u> ; ID

209.	1875-1882	Letter from Tom Seaman to Richard Schulkins, Brian Arakaki and Michelle Mancias with attached documents	10/18/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel and State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> AI & ID
210.	1886	Fax Memo from Richard Schulkins to Greg Giometti	10/16/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P

211.	1893-(1929) 1928	Fax Cover Sheet from Michelle Mancias to Karl Chambers with attached documents	12/10/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
212.	1944-1948	Letter from Greg Giometti to Richard Schulkins re: status of litigation with attached fax cover sheets	12/05/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE & AI
213.	1949-1950	Fax Cover Sheet from Karl Chambers to Michelle Mancias with attached fax cover sheets	12/06/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID

214.	1951-1954	Fax Cover Sheet from Greg Giometti to Richard Schulkins, Michelle Mancias and Brian Arakaki with attached fax cover sheets	12/05/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel and State Farm representatives.	<u>Disclose;</u> ID
215.	1961-1968	Letter from Karl Chambers to Michelle Mancias with attached fax cover sheets	12/05/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
216.	1969-1971	Fax Cover Sheet from Greg Giometti to Richard Schulkins and Brian Arakaki with attached fax cover sheets	12/04/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel and State Farm representatives.	<u>Disclose;</u> ID

217.	1992-1993	Fax Cover Sheet from Terri Taylor to Diane, secretary for Richard Schulkins with attached fax cover sheets	12/04/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
218.	1998-2003	Letter from Tom Seaman to Deb Plouffe with attached documents	12/03/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel and State Farm representatives.	<u>Disclose;</u> ID
219.	2004-2008	Letter from Tom Seaman to Susan West with attached documents and fax cover sheets	12/03/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel and State Farm representatives.	<u>Disclose;</u> ID
220.	2009-(2018) 2013	Letter from Tom Seaman to Dyann Schieltz with attached documents	12/03/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel and State Farm representatives.	<u>Disclose;</u> ID

221.	2014 – 2018	<i>Letter from Tom Seaman to Steve Baird with attached documents</i>	12/03/02	<i>Attorney/Client Privilege as it is a communication between State Farm's legal counsel and State Farm representatives.</i>	<u>Disclose;</u> ID
222.	2019	Letter from Greg Giometti to Richard Schulkins	12/03/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
223.	2040-2041	Fax Cover Sheet from Karl Chambers to Richard Schulkins	12/02/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID

224.	2044	Fax Memo from Richard Schulkins to Greg Giometti and Tom Seaman	12/01/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID
225.	2045	Fax Memo from Richard Schulkins to Karl Chambers	12/01/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
226.	2052-2053	Fax Cover Sheet from Greg Giometti to Richard Schulkins	11/27/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID

227.	2056-2064	Fax Memo from Richard Schulkins to Greg Giometti and Tom Seaman with attached documents	11/27/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
228.	2075	Fax Cover Sheet from Greg Giometti to Richard Schulkins	11/26/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
229.	2079	Fax Memo from Richard Schulkins to Tom Seaman	11/25/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID

230.	2084-2089	Fax Memo from Richard Schulkins to Karl Chambers, Greg Giometti and Tom Seaman with attached documents	11/23/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> AI & ID
231.	2090-2094	Fax Memo from Richard Schulkins to Karl Chambers, Greg Giometti and Tom Seaman with attached documents	11/23/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
232.	2098-2099	Letter from Tom Seaman to Richard Schulkins with attached documents	11/21/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID

233.	2105-2112	Letter from Karl Chambers to Richard Schulkins with attached documents and fax cover sheets	11/19/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	2105-2106 <u>Not Disclosed</u> ; P 2107-2112 <u>Disclose</u> ; ID
234.	2113-2119	Fax Memo from Richard Schulkins to Karl Chambers with attached documents	11/19/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose</u> ; ID

235.	2120-2121	Fax Memo from Richard Schulkins to Tom Seaman and Greg Giometti	11/19/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
236.	2126-2127	Fax Cover Sheet from Terri Taylor to Richard Schulkins with attached fax cover sheets	11/18/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
237.	2128-2129	Fax Cover Sheet from Tom Seaman to Michael McCarthy, Faegre & Benson, attorney for State Farm	11/18/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID

238.	2133-2138	Letter from Greg Giometti to Richard Schulkins with attached documents and fax cover sheets	12/31/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID
239.	2139-2143	Letter from Greg Giometti to Richard Schulkins re: status of litigation with attached fax cover sheets	12/31/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	2139-2140 <u>Not Disclosed;</u> P 2141-2143 <u>Disclose;</u> ID

240.	2144	E-Mail from Michael McCarthy to David Murphy and Joseph Nistico re: litigation	12/31/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID
241.	2160-2161	Letter from David Murphy to Joseph Nistico with attached FedEx receipt	12/30/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
242.	2162-2186	Letter from Greg Giometti to Richard Schulkins with attached documents and fax cover sheets	12/30/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID

243.	2189	E-Mail from Joseph Nistico to David Murphy	12/30/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID
244.	2192	E-Mail from Richard Schulkins to Brian Arakaki and copied to Dave Eaton, Jon Sands, Tom Seaman and Kent Gorsuch	12/27/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel and State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE

245.	2193-2215	Fax Cover Sheet from Karl Chambers to Richard Schulkins with attached documents and fax cover sheets	12/27/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> AI & ID
246.	2216-2240	Fax Memo from Richard Schulkins to Karl Chambers and Greg Giometti with attached documents	12/27/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE & AI

247.	2241-2242	Letter from Richard Schulkins to Jon Sands	12/21/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> AI & ID
248.	2243-2248	Letter from Karl Chambers to Richard Schulkins with attached documents and fax cover sheets	12/26/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID

249.	2261	Fax Memo from Richard Schulkins to Karl Chambers	12/24/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
250.	2262-2266	Fax Memo from Richard Schulkins to Greg Giometti and Karl Chambers with attached documents	12/23/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE & AI

251.	2293-2297	E-Mail from Richard Schulkins to Tom Seaman with attached documents	12/23/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
252.	2298-2299	Fax Memo from Richard Schulkins to Karl Chambers	12/20/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P

253.	2304-2311	Fax Cover Sheet from Greg Giometti to Richard Schulkins with attached documents and fax cover sheets	12/19/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
254.	2312-2315	Fax Cover Sheet from Greg Giometti to Dave Eaton and Brian Arakaki with attached documents and fax cover sheets	12/18/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel and State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> AI & ID

255.	2316-2325	Letter from Greg Giometti to Dave Eaton and Brian Arakaki re: status of litigation with attached Fax Cover Sheets	12/18/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel and State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE & AI
256.	2332-2350	Letter from Tom Seaman to Richard Schulkins with attached documents and fax cover sheets	12/16/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID

257.	2354-2357	Fax Cover Sheet from Sam Linsenmaier, paralegal for Greg Giometti, to Steve Baird with attached documents and fax cover sheets	12/13/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel and State Farm representatives.	<u>Disclose;</u> ID
258.	2370-2374	Letter from Greg Giometti to Richard Schulkins with attached Fax Cover Sheets	12/12/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID

259.	2395-2423	Letter from Greg Giometti to Richard Schulkins re: status of litigation with attached documents and fax cover sheets	12/11/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE & AI
260.	2435	Handwritten notes of Tom Seaman re: conversation with Jon Sands	05/31/05	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
261.	2436-2442	Handwritten notes of Tom Seaman re: status of litigation	Undated (post-filing of litigation based on content)	Attorney/Client Privilege and Work Product as it consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P

262.	2443-2461	Handwritten notes of Tom Seaman re: John Rodman deposition	12/18/02	Attorney/Client Privilege and Work Product as it consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
263.	2462-2463	Handwritten notes of David Murphy re: conference with Richard Schulkins	05/20/05	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P

264.	2464-2465	E-Mail from Jon Sands to Richard Schulkins and Tom Seaman and copied to David Murphy	05/17/05	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID
265.	2466	E-Mail from Jon Sands to Tom Seaman and Richard Schulkins and copied to David Murphy	05/17/05	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID

266.	2467-2468	E-Mail from Jon Sands to Richard Schulkins, Tom Seaman, Susan Singleton and Dave Eaton and copied to David Murphy	05/16/05	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel and State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE & AI
267.	2469	E-Mail from Jon Sands to Richard Schulkins and Tom Seaman and copied to David Murphy	05/16/05	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID

268.	2470-2471	E-Mail from Jon Sands to Richard Schulkins, Tom Seaman and Dave Eaton and copied to David Murphy	05/04/05	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel and State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID
269.	2472-2473	E-Mail from Jon Sands to Richard Schulkins, Tom Seaman and Dave Eaton and copied to David Murphy	05/04/05	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel and State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P

270.	2474	E-Mail from Richard Schulkins to Tom Seaman, Dave Eaton and Jon Sands and copied to David Murphy	05/04/05	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel and State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID
271.	2475	Handwritten notes of David Murphy re: conference call with Richard Schulkins, Tom Seaman, Dave Eaton and Jon Sands	12/29/04	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel and State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P

272.	2477-2525	Case law		Work Product as it pertains to communication between State Farm's legal counsel and State Farm representatives and consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID
273.	2526	Handwritten notes of David Murphy re: conference call with Richard Schulkins, Jon Sands, Tom Seaman, and Michelle Mancias	02/24/04	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P

274.	2527	E-Mail from Terri Taylor to Tom Seaman	02/17/04	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
275.	2528	E-Mail from Terri Taylor to Tom Seaman and David Murphy	02/13/04	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
276.	2529	E-Mail from Terri Taylor to Tom Seaman and David Murphy	02/10/04	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
277.	2530	E-Mail from Terri Taylor to Tom Seaman and David Murphy	11/07/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID

278.	2531-2549	E-Mail from Jon Sands to Richard Schulkins and Tom Seaman with handwritten notes of Tom Seaman and attached documents	06/19/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	As Before
279.	2550	E-Mail from Terri Taylor to Tom Seaman and David Murphy	05/07/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose</u> ; ID
280.	2551	E-Mail from Terri Taylor to Tom Seaman and David Murphy	04/28/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose</u> ; ID

281.	2552	E-Mail from Richard Schulkins to Tom Seaman with handwritten notes of Tom Seaman	04/18/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID
282.	2553	E-Mail from Terri Taylor to Tom Seaman and David Murphy	03/10/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
283.	2554	E-Mail from Terri Taylor to Tom Seaman and David Murphy	03/06/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
284.	2555	E-Mail from Terri Taylor to Tom Seaman and David Murphy	03/06/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID

285.	2556	E-Mail from Terri Taylor to Tom Seaman and David Murphy	02/27/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
286.	2557-2560	Handwritten notes of Tom Seaman	Undated (post-filing of litigation based on content)	Attorney/Client Privilege and Work Product as it consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
287.	2561	Handwritten notes of David Murphy re: conference call with Jon Sands, Bruce Kaye, attorney for Greg Giometti and Karl Chambers, Greg Giometti and Karl Chambers	02/12/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P

288.	2562	Memo from Mark Jachimiak, attorney at SGM, to Greg Giometti	02/10/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
289.	2563-2565	Handwritten notes of David Murphy re: conference call with Greg Giometti, Tom Seaman, Richard Schulkins, and Jon Sands	02/05/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P

290.	2566	Handwritten notes of Greg Giometti	Undated (post-filing of litigation based on content)	Attorney/Client Privilege and Work Product as it consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
291.	2567-2568	Handwritten notes of Greg Giometti	02/05/03	Attorney/Client Privilege and Work Product as it consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P

292.	2569-2570	Handwritten notes of David Murphy re: conference call with Richard Schulkins, Brian Arakaki, Jon Sands and Dave Eaton	02/03/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel and State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
293.	2571	Handwritten notes of David Murphy re: conference with Richard Schulkins, Tom Seaman, and Jon Sands	01/30/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P

294.	2572-2575	Draft Motion to Dismiss Counterclaim of Yoon Boon Lee		Work Product as it pertains to communication between State Farm's legal counsel and State Farm representatives and consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID
295.	2577	E-Mail from Mary Byrd Dryden, secretary for Greg Giometti, re: telephone call from Bruce Kaye, attorney for Karl Chambers and Greg Giometti	01/27/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID

296.	2578	E-Mail from Paula O'Konski to Greg Giometti, Karl Chambers, Mary Frangis, Sarah Christiansen and Terri Taylor	Undated (post-filing of litigation based on content)	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
297.	2579	E-Mail from Mary Byrd Dryden, re: telephone call from Steve Baird	01/14/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel and State Farm's representatives.	<u>Disclose;</u> ID
298.	2580-2581	Handwritten notes of Mary Frangis	Undated (post-filing of litigation based on content)	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID

299.	2582	E-Mail from Marlene Beliveau, Faegre & Benson, to Paula O'Konski with handwritten notes of Mary Frangis	01/07/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
300.	2586	E-Mail from Joseph Nistico to David Murphy	12/30/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID

301.	2587	E-Mail from Terri Taylor to David Murphy and Greg Giometti	12/19/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
302.	2588	Memo to File from Mary Byrd Dryden	12/13/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel and State Farm representatives.	<u>Disclose;</u> ID

303.	2589-2602	Handwritten notes of Mary Frangis to Tom Seaman, with attached documents	Undated (post-filing of litigation based on content)	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID
304.	2603-2605	Draft letter from Tom Seaman to John Grund with handwritten notes of Greg Giometti and Tom Seaman	11/18/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
305.	2606-2640	Miscellaneous Correspondence in unrelated litigation – misfiled			<u>Not Disclosed;</u> P

306.	2641	Handwritten note from Tom Seaman to Mary Frangis	11/21/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID
307.	2642-2647	Handwritten notes of Tom Seaman re: hearing before Judge Kane	11/15/02	Attorney/Client Privilege and Work Product as it consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> AI
308.	2648	E-Mail from Terri Taylor to Mary Frangis re: telephone call from Laura Hartford, Court Reporter	11/15/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID

309.	2649	Handwritten note from David Murphy to Tom Seaman	11/13/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
310.	2650	E-Mail from Terri Taylor to Greg Giometti, Jon Halaby, Karl Chambers, Mary Frangis and Paula O'Konski and copied to Tom Seaman	11/08/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
311.	2651	E-Mail from Terri Taylor to Greg Giometti, Jon Halaby, Karl Chambers, Mary Frangis and Paula O'Konski and copied to Tom Seaman	11/08/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID

312.	2652-2662	Draft Motion with handwritten notes	11/--/02	Attorney/Client Privilege and Work Product as it consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> AI
313.	2663	Handwritten note of Tom Seaman to Terri Taylor	Undated (post-filing of litigation based on content)	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
314.	2664	E-Mail from Mary Dryden to Greg Giometti re: telephone call from Rob Baldwin	10/21/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
315.	2665-2675	Draft Discovery	Undated (post-filing of litigation based on content)	Attorney/Client Privilege and Work Product as it consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID

316.	2676	E-Mail from Mary Frangis to Jon Halaby	10/10/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
317.	2677	E-Mail from Mary Dryden to Tom Seaman re: telephone call from Rich Kaudy	10/07/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
318.	2678	E-Mail from Terri Taylor to Greg Giometti, Jon Halaby, Karl Chambers, Mary Frangis, and Paula O'Konski	10/02/03	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
319.	2679-2680	Handwritten notes of Greg Giometti	Undated (post-filing of litigation based on content)	Attorney/Client Privilege and Work Product as it consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P

320.	2681	Handwritten notes of Mary Frangis	09/18/02	Attorney/Client Privilege and Work Product as it consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID
321.	2682-2686	Handwritten notes of Tom Seaman re: conference call with Richard Kaudy, Fred Paoli, Rob Baldwin and Greg Giometti	08/26/02	Work Product as it consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
322.	2687-2689	Handwritten notes of Mary Frangis	09/30/02	Attorney/Client Privilege and Work Product as it consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID
323.	2690	E-Mail from Mary Dryden to Greg Giometti re: telephone call from Rich Kaudy	08/15/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID

324.	2691	Memorandum from Paula O'Konski to Tom Seaman, Greg Giometti, Mary Frangis, Karl Chambers and Jon Halaby	09/24/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
325.	2692	E-Mail from Mary Dryden to Tom Seaman re: telephone call from Rich Kaudy	09/04/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	<u>Disclose;</u> ID
326.	2693	Memorandum from Mark Jachimiak to Greg Giometti	09/16/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P

327.	2694	Handwritten notes of Greg Giometti	Undated (post-filing of litigation based on content)	Attorney/Client Privilege and Work Product as it consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
328.	2695-2696	Handwritten notes of Tom Seaman	Undated (post-filing of litigation based on content)	Attorney/Client Privilege and Work Product as it consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> AI
329.	2697	Handwritten notes of Mary Frangis	08/21/02	Attorney/Client Privilege and Work Product as it consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> AI

330.	2698-(2712) 2708	Draft letter to Dave Eaton with handwritten notes of Tom Seaman	07/12/02	Attorney/Client Privilege and Work Product as it consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE & AI
331.	2709 - 2712	<i>Handwritten note from Tom Seaman to Greg Giometti, with attached E-Mail from Sylvia D. Moseley, secretary at SGM</i>	07/12/02	<i>Attorney/Client Privilege and Work Product as it consists of mental impressions, conclusions, opinions, or legal theories.</i>	<u>Disclose;</u> CFE & AI
332.	2713	Handwritten notes of Mary Frangis	08/05/02	Attorney/Client Privilege and Work Product as it consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> ID

333.	2714-2715	Handwritten notes of Tom Seaman	Undated (post-filing of litigation based on content)	Attorney/Client Privilege and Work Product as it consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE & AI
334.	2716	Handwritten notes of Tom Seaman re: conference with Dave Eaton, Brian Arakaki and Greg Giometti	07/19/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel and State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> AI

335.	2926-2937	Letter from Greg Giometti to Dave Eaton re: status of litigation and legal opinion	07/19/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel and State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> AI
336.	2966-2686	Fax Cover Sheet from Steve Baird to Greg Giometti with attached documents	07/17/02	Attorney/Client Privilege as it is a communication between State Farm representatives and State Farm's legal counsel.	<u>Disclose;</u> CFE

337.	2987-3006	Fax Cover Sheet from Steve Baird to Greg Giometti with attached documents	07/11/02	Attorney/Client Privilege as it is a communication between State Farm representatives and State Farm's legal counsel.	<u>Disclose;</u> CFE & AI
338.	3007-3381	Letter from Greg Giometti to Richard Schulkins re: status of litigation with attached documents	09/27/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> AI

339.	3382-3403	Confidential Settlement Conference Statement from John Rodman to Judge Richard C. Davidson	07/15/99	Attorney/Client Privilege and Work Product as it is a communications by John Rodman, attorney representing Mr. Thorne, and contains conclusions, opinions, or legal theories; prepared in conjunction with a mediation and is confidential pursuant to C.R.S. §13-22-307.	<u>Not Disclosed;</u> P
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340.	3404-3408	Confidential Settlement Conference Statement from John Rodman to Judge Richard C. Davidson	10/18/99	Attorney/Client Privilege and Work Product as it is a communications by John Rodman, attorney representing Mr. Thorne, and contains conclusions, opinions, or legal theories; prepared in conjunction with a mediation and is confidential pursuant to C.R.S. §13-22-307.	<u>Not Disclosed;</u> P
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341.	3409-3414	Confidential Settlement Conference Statement from John Rodman to Judge Richard C. Davidson	01/29/01	Attorney/Client Privilege and Work Product as it is a communications by John Rodman, attorney representing Mr. Thorne, and contains conclusions, opinions, or legal theories; prepared in conjunction with a mediation and is confidential pursuant to C.R.S. §13-22-307.	<u>Not Disclosed;</u> P
342.	3513	SGM Cost Request from Tom Seaman to Brian Arakaki with attached invoice	05/05/03	Attorney/Client Privilege as it is a communication between State Farm representatives and State Farm's legal counsel.	<u>Disclose;</u> ID

343.	3514-3515	SGM Cost Request from David Murphy to Brian Arakaki with attached invoice	05/05/03	Attorney/Client Privilege as it is a communication between State Farm representatives and State Farm's legal counsel.	<u>Disclose;</u> ID
344.	3516-3517	SGM Cost Request from Tom Seaman to Steve Baird with attached invoice	04/22/03	Attorney/Client Privilege as it is a communication between State Farm representatives and State Farm's legal counsel.	<u>Disclose;</u> ID
345.	3518-3519	SGM Cost Request from Tom Seaman to Brian Arakaki with attached invoice	04/08/03	Attorney/Client Privilege as it is a communication between State Farm representatives and State Farm's legal counsel.	<u>Disclose;</u> ID

346.	3520-3521	SGM Cost Request from Tom Seaman to Brian Arakaki with attached invoice	03/27/03	Attorney/Client Privilege as it is a communication between State Farm representatives and State Farm's legal counsel.	<u>Disclose;</u> ID
347.	3522-3525	SGM Cost Request from Greg Giometti to Brian Arakaki with attached invoice	02/24/03	Attorney/Client Privilege as it is a communication between State Farm representatives and State Farm's legal counsel.	<u>Disclose;</u> ID
348.	3526-3528	SGM Cost Request from Tom Seaman to Brian Arakaki with attached invoice	02/24/03	Attorney/Client Privilege as it is a communication between State Farm representatives and State Farm's legal counsel.	<u>Disclose;</u> ID

349.	3529-3531	SGM Cost Request from Tom Seaman to Brian Arakaki with attached invoice	02/24/03	Attorney/Client Privilege as it is a communication between State Farm representatives and State Farm's legal counsel.	<u>Disclose;</u> ID
350.	3532-3533	SGM Cost Request from Tom Seaman to Brian Arakaki with attached invoice	02/14/03	Attorney/Client Privilege as it is a communication between State Farm representatives and State Farm's legal counsel.	<u>Disclose;</u> ID
351.	3534-3535	SGM Cost Request from Tom Seaman to Brian Arakaki with attached invoice	02/14/03	Attorney/Client Privilege as it is a communication between State Farm representatives and State Farm's legal counsel.	<u>Disclose;</u> ID

352.	3536-3537	SGM Cost Request from David Murphy to Brian Arakaki with attached invoice	02/04/03	Attorney/Client Privilege as it is a communication between State Farm representatives and State Farm's legal counsel.	<u>Disclose;</u> ID
353.	3538-3539	SGM Cost Request from David Murphy to Brian Arakaki with attached invoice	01/30/03	Attorney/Client Privilege as it is a communication between State Farm representatives and State Farm's legal counsel.	<u>Disclose;</u> ID
354.	3540-3541	SGM Cost Request from Tom Seaman to Brian Arakaki with attached invoice	01/14/03	Attorney/Client Privilege as it is a communication between State Farm representatives and State Farm's legal counsel.	<u>Disclose;</u> ID

355.	3542-3543	SGM Cost Request from Tom Seaman to Brian Arakaki with attached invoice	01/14/03	Attorney/Client Privilege as it is a communication between State Farm representatives and State Farm's legal counsel.	<u>Disclose;</u> ID
356.	3544-3546	SGM Cost Request from Greg Giometti to Brian Arakaki with attached invoice	01/06/03	Attorney/Client Privilege as it is a communication between State Farm representatives and State Farm's legal counsel.	<u>Disclose;</u> ID
357.	3547-(3558) 3556	Fax Cover Sheet from Terri Taylor to Toni Hilton, secretary to Brian Arakaki, with attached SGM Cost Request dated 11/26/02 and fax cover sheets	01/09/03	Attorney/Client Privilege as it is a communication between State Farm representatives and State Farm's legal counsel.	<u>Disclose;</u> ID

358.	3557 - 3558	<i>SGM Cost Request from Tom Seaman to Brian Arakaki with attached invoice</i>	12/26/02	<i>Attorney/Client Privilege as it is a communication between State Farm representatives and State Farm's legal counsel.</i>	<u>Disclose;</u> ID
359.	3559-3560	SGM Cost Request from Tom Seaman to Brian Arakaki with attached invoice	12/26/02	Attorney/Client Privilege as it is a communication between State Farm representatives and State Farm's legal counsel.	<u>Disclose;</u> ID
360.	3561-3565	Fax Cover Sheet from Terri Taylor to Toni Hilton with attached SGM Cost Request dated 12/19/02 and fax cover sheets	02/19/03	Attorney/Client Privilege as it is a communication between State Farm representatives and State Farm's legal counsel.	<u>Disclose;</u> ID

361.	3566-3567	SGM Cost Request from Tom Seaman to Brian Arakaki with attached invoice	12/13/02	Attorney/Client Privilege as it is a communication between State Farm representatives and State Farm's legal counsel.	<u>Disclose;</u> ID
362.	3568-3569	SGM Cost Request from Tom Seaman to Brian Arakaki with attached invoice	12/10/02	Attorney/Client Privilege as it is a communication between State Farm representatives and State Farm's legal counsel.	<u>Disclose;</u> ID
363.	3570-3571	SGM Cost Request from Greg Giometti to Steve Baird with attached invoice	12/06/02	Attorney/Client Privilege as it is a communication between State Farm representatives and State Farm's legal counsel.	<u>Disclose;</u> ID

364.	3572-3573	SGM Cost Request from Greg Giometti to Steve Baird with attached invoice	12/06/02	Attorney/Client Privilege as it is a communication between State Farm representatives and State Farm's legal counsel.	<u>Disclose;</u> ID
365.	3574-3575	SGM Cost Request from Greg Giometti to Steve Baird with attached invoice	12/03/02	Attorney/Client Privilege as it is a communication between State Farm representatives and State Farm's legal counsel.	<u>Disclose;</u> ID
366.	3576-3580	Fax Cover Sheet from Terri Taylor to Toni Hilton with attached SGM Cost Request dated 11/27/02 and fax cover sheets	03/10/03	Attorney/Client Privilege as it is a communication between State Farm representatives and State Farm's legal counsel.	<u>Disclose;</u> ID

367.	3581-3582	SGM Cost Request from Greg Giometti to Steve Baird with attached invoice	10/24/02	Attorney/Client Privilege as it is a communication between State Farm representatives and State Farm's legal counsel.	<u>Disclose;</u> ID
368.	3583-3584	SGM Cost Request from Greg Giometti to Steve Baird with attached invoice	10/24/02	Attorney/Client Privilege as it is a communication between State Farm representatives and State Farm's legal counsel.	<u>Disclose;</u> ID
369.	3585-3586	SGM Cost Request from Greg Giometti to Steve Baird with attached invoice	10/24/02	Attorney/Client Privilege as it is a communication between State Farm representatives and State Farm's legal counsel.	<u>Disclose;</u> ID

370.	3587-3588	SGM Cost Request from Greg Giometti to Steve Baird with attached invoice	10/23/02	Attorney/Client Privilege as it is a communication between State Farm representatives and State Farm's legal counsel.	<u>Disclose;</u> ID
371.	3605-3619	Expense receipts for David Murphy	Various	Credit Card Nos. redacted.	<u>Disclose;</u> ID
372.	3631-3635	Fax Memo from Richard Schulkins to Greg Giometti and Karl Chambers with attached documents	12/23/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE & AI

373.	3663	Letter from Richard Schulkins to Jon Sands	12/21/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> AI & ID
374.	3664	E-Mail from Richard Schulkins to Brian Arakaki and copied to Dave Eaton, Jon Sands, Tom Seaman and Kent Gorsuch	12/27/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel and State Farm representatives that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Disclose;</u> CFE

375.	3665-3669	E-Mail from Richard Schulkins to Tom Seaman	12/23/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	<u>Not Disclosed;</u> P
376.	3670-(3695) 3693	Fax Memo from Richard Schulkins to Karl Chambers and Greg Giometti	12/27/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	

377.	3704-3708	E-Mail from Richard Schulkins to Tom Seaman with attached documents	12/23/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	
378.	3709-3710	Fax Memo from Richard Schulkins to Karl Chambers	12/20/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	

379.	3711-3732	E-Mail from Richard Schulkins to Tom Seaman and Karl Chambers with attached documents	10/24/03	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	
380.	3746-3751	E-Mail from Richard Schulkins to David Murphy and Tom Seaman with attached documents	10/02/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	

381.	3752-(3755) 3754	Fax Memo from Richard Schulkins to David Murphy with attached documents	10/03/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	
382.	3755	<i>E-Mail from Richard Schulkins to State Farm attorneys</i>	10/03/02	<i>Attorney/Client Privilege as it is a communication between State Farm's legal counsel and is unrelated to this case</i>	

383.	3756-3758	E-Mail from Marie Williams, Faegre & Benson, to Richard Schulkins, Tom Seaman and David Murphy with attached documents	10/01/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	
384.	3759	E-Mail from Marie Williams to Richard Schulkins, Tom Seaman and David Murphy	10/01/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	

385.	3760-3762	E-Mail from Marie Williams to Richard Schulkins, Tom Seaman and David Murphy	10/01/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	
386.	3763-3764	E-Mail from Richard Schulkins to Marie Williams, Michael McCarthy and Tom Seaman	10/01/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	

387.	3765-3766	E-Mail from Michael McCarthy to Richard Schulkins, Marie Williams, and Tom Seaman	10/01/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	
388.	3767	E-Mail from Marie Williams to Richard Schulkins, Tom Seaman and David Murphy	10/01/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	

389.	3768-3769	E-Mail from Richard Schulkins to State Farm attorneys	10/01/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel and is unrelated to this case.	
390.	3770	E-Mail from Richard Schulkins to Tom Seaman with E-mail from Dave Eaton to Kent Gorsuch, Counsel for State Farm, and Richard Schulkins	10/02/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	
391.	3771	E-Mail from Richard Schulkins to Marc Levy	10/02/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	
392.	3772	E-Mail from Richard Schulkins to Susan Lambdin	10/02/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	

393.	3773	E-Mail from Richard Schulkins to Debra Sutton	10/02/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	
394.	3774	E-Mail from Richard Schulkins to Tom Seaman with E-mail from Debra Sutton to Richard Schulkins	10/02/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	
395.	3775-3776	E-Mail from Marie Williams to Tom Seaman and David Murphy	10/02/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	

396.	3778	E-Mail from Suzanne Lambdin to Richard Schulkins	10/02/02	Attorney/Client Privilege as it is a communication between State Farm's legal counsel.	
397.	3779-3780	E-Mail from Richard Schulkins to Tom Seaman	10/07/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	
398.	3783-3784	E-Mail from Richard Schulkins to Tom Seaman	10/07/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	

399.	3785-3789	Fax Cover Sheet from Richard Schulkins to Tom Seaman with attached documents	10/07/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	
400.	3794	Handwritten notes of Tom Seaman	Undated (post-filing of litigation based on content)	Attorney/Client Privilege and Work Product as it consists of mental impressions, conclusions, opinions, or legal theories.	

401.	3795-3799	Interoffice Memorandum from Michelle Mancias to Richard Schulkins	10/02/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	
402.	3800-3801	Handwritten notes of Tom Seaman	Undated (post-filing of litigation based on content)	Attorney/Client Privilege and Work Product as it consists of mental impressions, conclusions, opinions, or legal theories.	

403.	3802-3808	Letter from Greg Giometti to Richard Schulkins re: status of litigation	09/27/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	
404.	3809-3815	Letter from Greg Giometti to Richard Schulkins re: status of litigation	09/27/02	Attorney/Client Privilege and Work Product as it is a communication between State Farm's legal counsel that consists of mental impressions, conclusions, opinions, or legal theories.	

405.	3816-3884	Thorne Electronic Claim File	Various	<p>Log Notes No. 482 dated 11/07/02 and No. 418 dated 07/11/02 – Redacted as Attorney/Client Privilege and Work Product as it is a communication between State Farm’s legal counsel and State Farm representatives. Log Notes regarding communications between State Farm and John Rodman have not been redacted because they are within the scope of Judge Kane’s Order dated November 15, 2002.</p>	<p><u>Disclose;</u> CFE & AI</p>
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406.	3885	Fax Cover Sheet from Brian Arakaki to Mary at SGM	12/31/02	Attorney/Client Privilege as it is a communication between State Farm representatives and State Farm's legal counsel.	
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THE FOLLOWING CATEGORIES OF DOCUMENTS ARE SUBJECT TO THE ATTORNEY/CLIENT PRIVILEGE AND WORK PRODUCT AS THEY WERE PREPARED OR CREATED AFTER THE FILING OF THE SUBJECT LITIGATION ON JUNE 17, 2002 AND ARE COMMUNICATIONS BY OR BETWEEN STATE FARM'S LEGAL COUNSEL THAT CONSIST OF MENTAL IMPRESSIONS, CONCLUSIONS, OPINIONS, OR LEGAL THEORIES.

Privileged Documents Received from Corporate – 33 Files
Electronic Claim Log (not redacted)
Research
Waiver of Attorney-Client Privilege – Research
Investigation – Research
Documents with Sticky Note titled “Documents for Deposition” (Working Files)
Drafts (Working Files) (SF Response to Lee Discovery)
Endorsement of Exhibits, Manuals, etc. (Working File)
Settlement Conference – Lee/Thorne (Working File and Notes)
Plaintiff Lee’s Amended Complaint (Working File)
Laugesen Deposition (Working File)
Michael Hodges (Working File)

Schieltz Deposition (Working File)
West Deposition (Working File)
Plouffe Deposition (Working File)
Black Binder with Memo to Greg from Mark Regarding Review Of Kaudy's Request for Supplemental Responses To Written Discovery with Attached Discovery and Orders
Baird Deposition (Working File)
Miller Deposition (Working File)
Gary Fye Deposition (Working File) (3 files)
Legal Research
Lee - Legal Standing (Working File and Research)
John Grund (Working File)
Motion to Compel (includes Exhibit 61 – ACE documents for sealed Motion to Expand Protective Order) (Working File)
Plaintiffs' Disclosures (Working File)
Motion to Vacate Judgment (Working File)
Waiver of Attorney-Client Privilege (Working File)
Unlabeled File with Documents from Lee PIP File
Unlabeled File with Documents from Lee PIP File
Pleadings, Motions, etc. re Motion to Vacate Judgment (Working File)
Rule 26(a)(1) Privilege log (with handwritten notes)
Seaman & Giometti Amended Rule 26(a)(1) Privilege/Litigation Log – Correspondence Log between Seaman & Giometti and State Farm in Connection with Extra Contractual Claim
Pleadings (Working Copies)
Attorney notes re Larry Thorne Deposition and Working Copies of Documents
Memorandum Brief in Support of Cross Motion for Summary Judgment filed in Grange Insurance Association v. Wertz, El Paso County District Court

Letter from Baldwin & Brown, dated November 21, 2002, enclosing Def. Thorne's Responses to Plaintiff's Request for Admissions, Interrogatories and RFP – duplicates
Drafts – Motion to Disqualify Kaudy (Working File)
Jerry Wagner (Working File)
Ed Gindrich (Working File)
Outline for Hearing on Motions for Partial Summary Judgment (Working File)
Extra Copy of Thorne's Response to State Farm's Motion for Partial Summary Judgment
Extra Copy of Brief Opposing Plaintiff's Motion for Partial Summary Judgment
Stack of Documents with sticky label "Stuff from Tom's Desk" (Working Files) (includes Plaintiff State Farm's Motion for Protective Order Regarding Deposition of Rule 36(b)(6) Representative) – (working copies)
Misc. Copies of Pleadings and Documents (includes ACE documents)
Black Binder Labeled "Lee v. Thorne (Vol. 1 of 3)" with Index titled, "Discovery/Medical Notebook" and tabbed sections (Working File)
Black Binder Labeled "Lee v. Thorne (Vol. 2 of 3)" with Index titled, "Discovery/Medical Notebook" and tabbed sections and including loose copy of Coverage Opinion dated April 3, 2002, Memorandum dated Nov. 2, 2001 Re: Fye – Inadmissibility of Opinion Testimony Concerning the Validity of Statements made by Other Witnesses; Fye Documents (identified by Ron Getchey and Misc. Case Law) Rodman Billing Statements (Working File)
Black Binder Labeled "Lee v. Thorne (Vol. 3 of 3)" with Index, "Discovery/Medical Notebook" (Working File)

THE FOLLOWING CATEGORIES OF DOCUMENTS ARE DUPLICATES/WORKING COPIES AND MAY INCLUDE DOCUMENTS SUBJECT TO THE ATTORNEY/CLIENT PRIVILEGE AND WORK

PRODUCT AS THEY WERE PREPARED OR CREATED AFTER THE FILING OF THE SUBJECT LITIGATION ON JUNE 17, 2002 AND ARE COMMUNICATIONS BY OR BETWEEN STATE FARM'S LEGAL COUNSEL THAT CONSIST OF MENTAL IMPRESSIONS, CONCLUSIONS, OPINIONS, OR LEGAL THEORIES.

Pleadings Files – State Farm v. Lee – Vol. 1, Vol. 2, Vol. 3, Vol. 4, Vol. 5 (1 of 2), Vol. 5 (2 of 2)
Deborah Plouffe Deposition dated Nov. 14, 2002
Responses – ACE, etc.
Rich Report
Ricci Letter
John R. Rodman Deposition, Nov. 18, 2002
John R. Rodman Exhibits
John R. Rodman Deposition, Dec. 18, 2002
John Rodman Exhibits, Vol. 2
Response-Determination of Law
Dyann Schlietz Deposition, dated Nov. 11, 2002
Dyann Schlietz Deposition, dated Nov. 11, 2002
Dr. Richard F. Spiegle Deposition, dated May 17, 1999
Thorne Deposition, Nov. 20, 2002 (1 of 2)
Thorne Deposition, Nov. 20, 2002 (Vol. 2 of 2)
Susan West Deposition dated Nov. 13, 2002
Susan West Deposition dated Nov. 13, 2002
Activity Logs (not redacted)
Ads
AT v. State Farm – Use of PIP Medical (Research)

Auto Claim Manual – Other Insured
Bahr, Kreidle Documents
Steven Baird Deposition, Nov. 12, 2002
Steven Baird Deposition, dated Nov. 12, 2002
Steven Baird Deposition, dated Dec. 19, 2002 (Vol. 2)
Basic Pleadings (State Farm v. Lee)
Cases
Sean Choi Affidavit dated July 18, 2002
Claim Committee
Disclosures – Letters
Discovery Pleadings
Discovery Requests
Endorsements
Expert Disclosures
Fye Report, dated August 26, 2002
GCM-453
Grund Report
Richard M. Hodges Affidavit, dated July 19, 2002
Richard M. Hodges Deposition, dated Nov. 13, 2003, Vol. 2 of 3
Richard M. Hodges Deposition, dated Jan. 15, 2003 (Vol. 2 of 2)
Injury Evaluation Report
Jury Instruction – BI
Richard W. Laugesen Deposition, dated Nov. 27, 2002
Richard Laugesen Exhibits
File labeled, Lee v. State Farm – “C-31103” with listing of State Farm Testimony Exhibits and What Appear to be Attorney Comments in Right Hand Margin

Yoon Boon Lee Statement, dated July 18, 2002
State Farm Manual – Legal Services Program
File labeled “Misc. Material”
Motion to Vacate Judgment with tabbed Exhibits
News Letter – S&G
Objection to Hearing Delay with Indexed Exhibits
PIP File Materials
Lee PIP File

THE FOLLOWING CATEGORIES OF DOCUMENTS ARE SUBJECT TO THE ATTORNEY/CLIENT PRIVILEGE AND WORK PRODUCT AS THEY INCLUDE COMMUNICATIONS BETWEEN MR. THORNE AND HIS ATTORNEY JOHN RODMAN AND CONSIST OF MENTAL IMPRESSIONS, CONCLUSIONS, OPINIONS, OR LEGAL THEORIES.

Original Thorne Claim File
Thorne Claim Log (includes Privilege Log) (Original redacted log)
Electronic Claim Log (not redacted)
Claim File 06-3804-159 – Bates Stamp Labels beginning Thorne CF 000001 through Thorne CF 002396 (w/ Privileged Documents)
Package of Documents with Rule 26(a)(1) Log of Privilege Documents Withheld (and Privileged Documents)
Package of Documents from Thorne Claim File with Confidential Settlement Statements from John Rodman to Judge Davidson
Package of Documents labeled Davidson Correspondence
Black Binder with Misc. Thorne Privileged Documents

Thorne Claim File - Bates Stamp Labeled "SF/Thorne 000001 – 000599" (Working File)
Thorne Claim File – Bates Stamped SF/Thorne 000600 – 001500 (Working File)
Thorne Claim File – Bates Stamped SF/Thorne 001501 – 002180 (Working File)
Two Sets of Documents with Seaman & Giometti Rule 26(a)(1) Log of Privileged Documents
Seaman & Giometti Rule 26(a)(1) Log of Documents Withheld with Attached Copies of Documents
Package of Documents with Seaman & Giometti Rule 26(a)(1) Log of Documents Withheld with Attached Documents Labeled "These Are (Taken) From the Kaudy File Copy"
Seaman & Giometti Rule 26(a)(1) Privilege/Anticipation of Litigation Log – Set Labeled "File Copy;" Set Labeled "Baldwin Copy;" – Set Labeled "These Were Pulled from Rich Kaudy's Documents"