

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
Civil Division

Estate of ROBERT E. WONE, by
KATHERINE E. WONE,
as Personal Representative,

Plaintiff,

v.

JOSEPH R. PRICE, VICTOR J.
ZABORSKY,
and DYLAN M. WARD,

Defendants.

Civil Action No. 008315-08

The Honorable Brook Hedge

Next Event: Deadline for Discovery
Requests, December 15, 2010

**PLAINTIFF'S MOTION TO COMPEL PRODUCTION OF THIRD-PARTY
DOCUMENTS WITHHELD BY DEFENDANT PRICE**

Pursuant to Rules 34 and 37 of the D.C. Superior Court Rules of Civil Procedure, Plaintiff Estate of Robert E. Wone, by Katherine E. Wone as Personal Representative, through its attorneys, moves for an order to compel Defendant Joseph Price to produce all documents listed on the three privilege logs he provided to Plaintiff's counsel in 2009 relating to documents in the possession of his former employer, or, in the alternative, to compel Mr. Price to produce (i) all documents described on the privilege logs as protected by the "registered domestic partner privilege"; and (ii) all documents described on the privilege logs as protected by the "joint defense privilege," which were communications between and among the Defendants only, without counsel. The grounds for this motion are set forth in the attached Memorandum of Points and Authorities.

Rule 12-I(a) certification: Defendant Joseph R. Price, through counsel, would not consent to this motion.

Respectfully submitted,

/s/ Benjamin J. Razi

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Dated: September 10, 2010

Counsel for Plaintiff

CERTIFICATE OF CONSULTATION

I hereby certify that, pursuant to Rule 37(a) of the Superior Court Rules of Civil Procedure, Plaintiff's counsel has regularly communicated with counsel for Defendant Price by telephone and e-mail beginning in July 2010 and continuing until today in an attempt to resolve the subject of this Motion. Despite the good faith effort to resolve this dispute, counsel for the parties were unable to reach agreement.

/s/ Benjamin J. Razi

Benjamin Razi

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ORDER

This matter coming before the Court on Plaintiff Estate of Robert E. Wone's Motion to Compel Production of Third-Party Documents Withheld by Defendant Price (the "Motion to Compel"), and in consideration of the Motion to Compel and the entire record, it is by the Court this ___ day of _____, 2010,

ORDERED THAT:

1. The Motion to Compel is GRANTED.
2. Defendant Joseph R. Price shall produce all documents listed on the three privilege logs he has provided to Plaintiff relating to documents possessed by his former employer, which privilege logs are respectively labeled "Privilege Log Re: Category Two," "Privilege Log - Disc 5," and "Privilege Log - Discs 6 & 7."

JUDGE BROOK HEDGE

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**PLAINTIFF'S MEMORANDUM OF POINTS AND AUTHORITIES
IN SUPPORT OF MOTION TO COMPEL PRODUCTION OF
THIRD-PARTY DOCUMENTS WITHHELD BY DEFENDANT PRICE**

On the night of August 2, 2006, Robert Wone was murdered while he was a guest in the Swann Street, Northwest home of Defendants Joseph Price, Victor Zaborsky, and Dylan Ward. This is a motion to compel e-mail communications between and among the Defendants in the days, weeks, and months surrounding Robert Wone's murder. Even though these highly relevant communications were exchanged only among the Defendants -- outside the presence of their counsel -- Defendant Price has to date prevented his former employer from producing these documents based on a variety of baseless claims of privilege. The Court should overrule Defendant Price's privilege objections and order him to produce the documents that he is withholding from Mrs. Wone.

At the time of Robert Wone's murder, Defendant Price was employed as a partner by a law firm based in the District of Columbia. In response to a third-party document subpoena,

that firm produced to Mrs. Wone numerous responsive documents. However, Defendant Price directed his former firm to withhold from production over 800 responsive email communications on various grounds of purported privilege.¹ Among the documents being withheld at the direction of Defendant Price are approximately 45 emails between Defendants Price and Zaborsky or among all three Defendants that were sent in the period June-November 2006, immediately surrounding the murder of Robert Wone. For obvious reasons, these communications -- which have been designated responsive by Defendant Price's former employer -- are reasonably calculated to lead to the discovery of admissible evidence and they should be produced.

Defendant Price has no basis upon which to withhold these documents from Mrs. Wone. Because the email and computer usage policy of Mr. Price's former employer explicitly provided that the firm owns all data transmitted on its network, and that users have no expectation of privacy with respect to any such data, none of these communications could have been expected to remain confidential. Consequently, Defendant Price has no privilege with respect to non-work-related emails sent using his workplace email account.

Even if Defendant Price had the right to claim a privilege over communications sent from his workplace email account, no valid privilege could apply to emails between him and Defendant Zaborsky that did not include counsel. In withholding these communications, Defendant Price purports to rely on the spousal privilege. In the District of Columbia, though, the spousal privilege applies only to "testimony." *See* D.C. Code § 14-306. Accordingly, the

¹ Importantly, the documents that Defendant Price directed his former employer to withhold from production are Defendant Price's personal communications; these documents do not relate to the firm's clients or its business. The firm has not asserted any privileges with respect to the documents withheld at Mr. Price's direction.

Price-Zaborsky emails cannot be shielded from discovery. Under the plain language of the statute, these documents are not “testimony” and they therefore are not privileged.

Likewise, even if Defendant Price had a reasonable expectation of privacy with respect to personal emails sent on his work computer (in the face of the explicit policy saying there was no such expectation), the emails between Defendants Price and Ward (some of which also include Defendant Zaborsky) are not privileged. Although the privilege logs refer to a “joint defense” privilege, Defendant Price has not come close to meeting his burden of establishing the applicability of any such privilege between and among the Defendants only, not including any of Defendants’ counsel.

Because Defendant Price’s privilege assertions are unsupportable, the Court should overrule them and order the production of the documents that are currently being withheld from Mrs. Wone based on Defendant Price’s objections.

BACKGROUND

A. Subpoena to Mr. Price’s Former Employer and Subsequent Document Productions

This wrongful death lawsuit was filed on November 25, 2008. Shortly thereafter, on January 9, 2009, counsel for Mrs. Wone served a third-party document subpoena on Defendant Price’s former employer. *See* Affidavit of Benjamin J. Razi (“Razi Aff.”) ¶ 3 & Ex. 1. The subpoena sought, *inter alia*, all documents relating to Robert Wone, including his murder and/or the investigation into his murder. *See id.*

On February 6, 2009, Defendant Price’s former employer began a rolling production of responsive documents. *See id.*, ¶ 4 & Ex. 2. Defendant Price reviewed these documents prior to their production and withheld a significant quantity of them. *See id.* Subsequently, Defendant Price’s counsel identified the withheld documents on a privilege log.

Later productions were made subject to the same procedure and, on March 25, 2009, Mr. Price's counsel provided two additional privilege logs. *See id.* ¶ 5.

B. Meet-and-Confer Discussions Regarding Price Privilege Claims

In a letter dated April 8, 2009, Mrs. Wone's counsel initiated meet-and-confer discussions regarding Defendant Price's assertions of privilege over non-work-related documents created and transmitted on his work computer. *See Razi Aff.* ¶ 6 & Ex. 3. Mrs. Wone's counsel never received a response to that letter, and Mrs. Wone's ability to continue discovery had been stayed pending the resolution of the related criminal trial.

Once the stay was lifted, Mrs. Wone's counsel re-initiated meet-and-confer discussions regarding the Price privilege claims. *Id.* ¶ 10. Counsel exchanged correspondence and held numerous telephone conferences throughout July and August in an attempt to narrow the dispute. *Id.* Although Defendant Price withdrew his claims of privilege over a small number of documents and produced revised privilege logs, he stood by the overwhelming majority of his privilege claims. *Id.* ¶¶ 11-12.

C. Documents Withheld By Defendant Price

Of the documents identified as responsive by Defendant Price's former employer, Mr. Price has withheld from Mrs. Wone over 800 emails. The e-mails withheld at his direction include, for example:

- Eleven emails between Defendants Price and Zaborsky in August 2006 (the same month in which Robert Wone was murdered in Defendants' house);
- More than 30 emails between Defendants Price and Zaborsky in 2006 (the year of Robert Wone's murder); and
- More than 170 emails between Defendants Price and Ward, or among all three Defendants, 45 of which were sent in the months immediately surrounding the murder.

See Razi. Aff. ¶ 13 & Ex. 15.

D. Former Employer's Computer and Email Usage Policy

On July 1, 2010, Mrs. Wone served Defendant Price's former employer with a second subpoena seeking copies of any computer or email usage policy in effect between 2004 and 2009. *See id.* ¶ 8 & Ex. 4. The documents produced in response show that during the entire period relevant here, the firm maintained a "Computer Network and Telephone Usage Policy Statement" (the "Computer Policy"). *See id.* ¶ 9 & Exs. 5-6. The Computer Policy was revised on July 1, 2003, April 12, 2005, and January 1, 2007, but throughout that entire period, it always contained the same unequivocal warnings that data exchanged over the firm's network belongs to the firm and is "subject to subpoena and disclosure in a legal proceeding." *Id.*

Under the heading, "Use of Computer and Telephone Networks," the Computer Policy provides, "Please note that all hardware, software, and data (**including e-mail and voice mail messages**) are the property of the Firm or its clients . . ." *Id.*, Ex. 5 (emphasis in original).

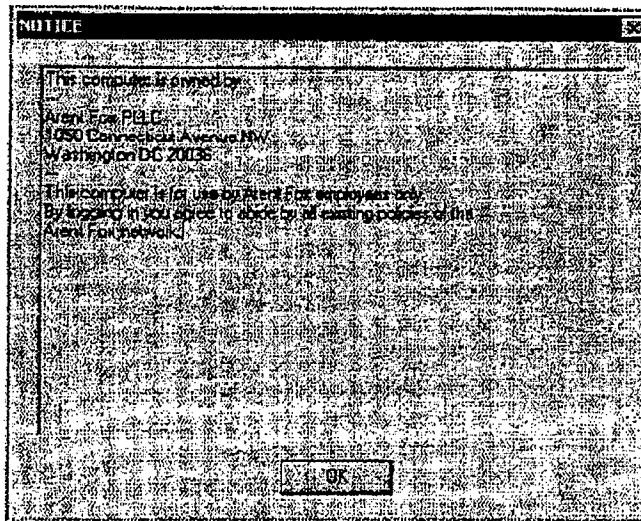
With respect to "Electronic Mail," the Computer Policy specifically states:

[A]ll data and correspondence, including electronic and voicemail, stored on the Firm's systems are the property of the Firm or its clients, and are subject to subpoena and disclosure in a legal proceeding and to review in the context of a document search or other management purposes. Users, therefore, do not have a personal right to or expectation of privacy or confidentiality with respect to any information on any of the Firm's computer, electronic mail or voice mail systems.

Id., Ex. 5 (emphasis in original); *see also id.*, Exs. 6 & 7.

In addition to these unequivocal statements, all users on the firm's computer network, including Mr. Price, were required to agree to be bound by the Computer Policy every time they logged on to the network. As a March 29, 2004 email to the DC Office attaching the Computer Policy explained:

Every time you log into your Firm-assigned work computer you are presented with the following notice:



The policies this notice refers to include the [Computer Network and Telephone Usage Policy Statement] attached above. When you click the “OK” button on this notice, you agree to abide by these policies.

Id., Ex. 7.

ARGUMENT

I. DEFENDANT PRICE’S PRIVILEGE CLAIMS ARE WITHOUT MERIT BECAUSE HE HAD NO REASONABLE EXPECTATION OF PRIVACY IN NON-WORK-RELATED EMAILS SENT THROUGH HIS EMPLOYER’S EMAIL ACCOUNT.

Defendant Price asserts that various privileges attach to the documents he has directed his former employer to withhold, including the attorney-client privilege, the spousal privilege, and the “joint-defense” privilege. For any of these protections to apply, a communication must have been made in confidence and kept confidential. *See, e.g., Jones v. United States*, 828 A.2d 169, 175 (D.C. 2003) (attorney-client privilege applies only to communications “made in confidence”); *United States v. Williams Cos.*, 562 F.3d 387, 394 (D.C. Cir. 2009) (work product doctrine applies when withholding party has “reasonable basis” for believing that materials will be kept confidential); D.C. Code § 14-306(b) (domestic partner not

competent to testify as to any “confidential communications” made by one to the other during partnership); *see also Minebea Co., Ltd. v. Papst*, 228 F.R.D. 13, 15 (D.D.C. 2005) (“joint defense or common interest rule presupposes the existence of an otherwise valid privilege”) (internal quotation marks and citation omitted).

Courts across the country have held that when an employer has a policy providing that the employer owns all data transmitted over the work computer network, and the employee consents to that policy, the employee has no expectation of privacy in communications sent over the network and otherwise valid privileges do not apply. In *United States v. Etkin*, No. 07-CR-913 (KMK), 2008 WL 482281 (S.D.N.Y. Feb. 20, 2008), for example, the court held, “without hesitation,” that the defendant could not withhold an email that he had sent to his wife using his work computer. “[E]mployees do not have a reasonable expectation of privacy in the contents of their work computers when their employers communicate to them via a flash-screen warning a policy under which the employer may monitor or inspect the computers at any time,” the court held. *Id.* at *2. “In sum,” the court concluded:

the issue here is whether the notices that appeared each time Defendant logged onto his work computer sufficiently notified Defendant that any email he sent to his wife from that computer might be read by a third party. The Court finds -- without hesitation -- that it did. Defendant’s claim that he actually did believe that the . . . email to his wife would remain confidential therefore is entirely unreasonable. Accordingly, the Court holds that the email communication at issue is not subject to the . . . privilege because it was not a confidential communication.

Id. at *5. Similarly, in *Alamar Ranch, LLC v. County of Boise*, No. CV-09-004-S-BLW, 2009 WL 3669741 (D. Idaho Nov. 2, 2009), the court held that an employee “had waived the [attorney-client] privilege for those messages she sent from her work computer.” *Id.* at *4. As the court explained, “[i]t is unreasonable for any employee in this technological age -- and particularly an employee receiving the [computer policy] notice [the employee] received -- to

believe that her e-mails, sent directly from her company's email address over its computers, would not be stored by the company and made available for retrieval." *Id.*; *see also, e.g., Long v. Marubeni Am. Corp.*, No. 05Civ.639(GEL)(KNF), 2006 WL 2998671, at *3-*4 (S.D.N.Y. Oct. 19, 2006) (attorney-client privilege and work product protection waived over emails sent through work computer where employer's policy warned that users have no right of personal privacy in data transmitted over employer network); *Kaufman v. SunGard Inv. Sys.*, No. 05-cv-1236 (JLL), 2006 WL 1307882, at *4 (D.N.J. May 10, 2006) (privileges waived over communications sent using work computer in light of employer computer policy); *Kelleher v. City of Reading*, 2002 WL 1067442, at *8 (E.D. Pa. May 29, 2002) (no reasonable expectation of privacy in workplace emails where employer "explicitly informed employees that there was no such expectation of privacy").

At the time that Defendant Price sent or received all of the communications that he is presently withholding, his employer had an unequivocal policy governing the use of its computer network. All users -- including Mr. Price -- were required to agree to the policy each time they logged on to their work computers. Not only did this policy provide that all "data **(including e-mail and voice mail messages)** are the property of the Firm or its clients," but it also specifically stated that all email "stored on the Firm's systems . . . are subject to subpoena and disclosure in a legal proceeding and to review in the context of a document search or other management purposes." Razi Aff., Ex. 5 (first emphasis in original; second emphasis added). Furthermore, the policy emphasized that, "[u]sers, therefore, do not have a personal right to or expectation of privacy or confidentiality with respect to any information on any of the Firm's computer, electronic mail or voice mail systems." *Id.* (emphasis in original).

The Computer Policy made plain in unambiguous terms that emails sent using the law firm's computers and email accounts were the property of the firm and its clients and, specifically, that users had no expectation of privacy in such communications.² As an experienced lawyer in a leading national law firm, Defendant Price surely understood the meaning of the clear policy. Under these circumstances, Defendant Price cannot withhold from Mrs. Wone on privilege grounds communications transmitted using his work computer, because Defendant Price had no reasonable expectation of privacy or confidentiality in such communications.³

II. THE PRICE-ZABORSKY EMAILS MUST BE PRODUCED BECAUSE THE SPOUSAL TESTIMONY PRIVILEGE APPLIES TO TESTIMONY, NOT PRE-EXISTING DOCUMENTS.

Even if Defendant Price somehow could reasonably have expected that emails he sent or received over his work email account would be kept confidential (notwithstanding the written policy stating just the opposite), he cannot withhold documents to which no valid privilege applies. Defendant Price has withheld at least 45 email exchanges with Defendant

² *Convertino v. Department of Justice*, No. 04-0236 (RCL), 2009 WL 4716034 (D.D.C. Dec. 10, 2009), does not suggest otherwise. "On the facts of [that] case," where there was no indication in the record of an employer policy disclaiming an expectation of privacy; and where the employee "took steps to delete the emails as they were coming into his account -- failing to realize that his employer had the emails," the court found the employee's expectation of privacy in workplace emails to be reasonable. *Id.* at *12. Unlike the employee in *Convertino*, Defendant Price cannot reasonably have enjoyed any expectation of privacy, because his employer's policy specifically stated that e-mails were "subject to subpoena and disclosure in a legal proceeding," and made clear that users had no "expectation of privacy" in e-mails sent over their work accounts.

³ In addition to the categories of emails described here, Defendant Price's privilege logs include numerous communications with counsel. Even though these documents are not privileged, because there was no reasonable expectation of confidentiality, Mrs. Wone proposed a potential compromise whereby Defendant Price produces his emails with his co-Defendants and others who are not counsel to any Defendant but does not produce emails sent to or from counsel. Defendant Price has not to date agreed to this proposed compromise.

Zaborsky on the basis of the spousal testimony privilege, which is governed by statute in the District of Columbia. All of the withheld Price-Zaborsky emails over which Defendant Price is claiming the spousal privilege were sent in the weeks and months immediately surrounding Robert Wone's murder. *See Razi Aff.*, Ex. 13.

Section 14-306 of the D.C. Code provides, in relevant part, that:

(a) In civil and criminal proceedings, a spouse or domestic partner is competent but not compellable to testify for or against their spouse or domestic partner.

(b) In civil and criminal proceedings, a spouse or domestic partner is not competent to testify as to any confidential communications made by one to the other during the marriage of domestic partnership.

D.C. Code § 14-306 (emphases added). Section 14-306 “completely abrogates the common law rule” on the spousal privilege. *Postom v. United States*, 322 F.2d 432, 433 (D.C. Cir. 1963).

This Court must begin its assessment of Defendant Price's privilege claims with the plain language of the statute. *See Providence Hosp. v. D.C. Dep't of Employment Servs.*, 855 A.2d 1108, 1111 (D.C. 2004) (“We are required to give effect to a statute's plain meaning if the words are clear and unambiguous.”). Moreover, courts construe the spousal privilege “narrowly because it obstructs the truth-finding process.” *United States v. Murphy*, 65 F.3d 758, 761 (9th Cir. 1995).

There is no ambiguity in Section 14-306. Subsection (a) governs the ability of one spouse to “testify” against the other and has no application here. *See Smith v. United States*, 947 A.2d 1131, 1135 (D.C. 2008) (“Under D.C. Code § 14-306(a) . . . , a witness may testify against his or her spouse in a criminal proceeding but cannot be compelled to do so.”). By the same token, subsection (b) is also inapplicable. On its face, this provision applies only to testimony. It prohibits one spouse only from “testify[ing]” as to confidential communications,

and we have not located any decision in which Section 14-306 has been invoked to protect pre-existing documents from discovery. Indeed, as would be expected given the plain statutory language, the only context in which the statute appears to have arisen is with respect to testimony, and courts have referred to the spousal privilege as a “testimonial” one. *See, e.g., Johnson v. United States*, 616 A.2d 1216, 1219 (D.C. 1992) (“Assertions of marital testimonial privilege are governed by D.C.Code § 14-306.”) (emphasis added); *cf. Blough v. Food Lion*, No. 93-1169, 1993 WL 321797, at *2 (4th Cir. 1993) (per curiam) (“[T]he plain language of the [priest-penitent privilege] statute does not extend the privilege to the mere production of documents, and we decline to interpret the statute broader than its plain language permits. As we have recognized, this statute, like testimonial privileges generally, is to be interpreted narrowly.”).

The D.C. spousal testimony privilege contrasts with other statutory privileges in the District which do protect against any disclosure of communications, not merely testimony about them. The physician-patient privilege, for example, codified at § 14-307, provides that “a physician or surgeon or mental health professional . . . may not be permitted, without the consent of the client, or of his legal representative, to disclose any information, confidential in its nature, that he has acquired in attending a client in a professional capacity . . .” Similarly, a D.C. privilege that applies between domestic violence victims and their counselors provides that “[a] domestic violence counselor shall not disclose a confidential communication” except under specific circumstances provided by the statute. D.C. Code § 14-310.

Section 14-306, by contrast, is a testimonial privilege only, so Defendant Price cannot invoke its protections to shield from discovery his email communications with Defendant Zaborsky.⁴

III. DEFENDANT PRICE HAS NOT MET HIS BURDEN OF PROVING THAT THE JOINT DEFENSE PRIVILEGE APPLIES TO HIS E-MAIL COMMUNICATIONS WITH HIS CO-DEFENDANTS.

In addition to withholding email exchanges exclusively between himself and Defendant Zaborsky, Defendant Price also has withheld more than 170 email exchanges with Mr. Ward, some of which also include Mr. Zaborsky. Mr. Price asserts the “joint defense” privilege over these communications.

The joint defense privilege is an “extension of the attorney-client privilege” that “permits a client to disclose information to [his or her] attorney in the presence of joint parties and their counsel without waiving the attorney-client privilege.” *Minebea*, 22 F.R.D. at 15 (internal quotation marks and citations omitted). The rule “presupposes the existence of an otherwise valid privilege,” and therefore all attorney-client communications or work product “must first satisfy the traditional requisites for the attorney-client or work product privilege before they become or remain privileged” under the joint interest rule. *Id.* at 16 (internal

⁴ In addition, to the extent that the emails between Defendants Price and Zaborsky were made in furtherance of any crime, they cannot be withheld from production. *See, e.g., United States v. Bey*, 188 F.3d 1, 4-5 (1st Cir. 1999) (“Communications concerning crimes in which the spouses are jointly participating . . . do not fall within the protection of the marital communications privilege.”) (internal quotation marks and citation omitted). Given that all three Defendants have invoked their Fifth Amendment right not to incriminate themselves in response to Mrs. Wone’s interrogatories, *see Razi Aff.* ¶ 14 & Exs. 16-18, the crime-fraud exception may apply here. Determining the applicability of the crime-fraud exception would require *in camera* review, because, of course, these documents have been shielded from Mrs. Wone’s counsel.

quotation marks and citations omitted).⁵ The parties to a communication must have “agreed to pursue a joint defense strategy” either in writing or through an “oral agreement whose existence, terms and scope are proved by the party asserting it.” *Id.* (internal quotation marks and citations omitted). Furthermore, the party or parties seeking to withhold information pursuant to the joint defense privilege “must demonstrate that the specific communications at issue were designed to facilitate a common legal interest.” *Id.* “The privilege arises out of the need for a common legal defense, as opposed merely to a common problem.” *Id.* (internal quotations marks, citation, and brackets omitted). Finally, as with the attorney-client privilege and work product protection, it is the burden of the party asserting the joint defense privilege to prove that the “communications/documents sought to be shielded are, in fact, privileged.” *Id.*

In this case, Defendant Price has not come close to meeting his burden. Defendant Price has not demonstrated that the underlying communications are themselves subject to another valid privilege, such as the attorney-client privilege or attorney work product doctrine, which is required before the joint defense privilege can attach. The communications between Defendants Price and Ward or among all three Defendants do not include counsel for any of the Defendants and, therefore, they do not constitute attorney-client communications. Furthermore, to the extent that any communications among the Defendants were made in furtherance of a crime, any asserted privilege over them would be destroyed. *See, e.g., Crane v. Crane*, 614 A.2d 935 (D.C. 1992) (crime-fraud exception vitiates attorney-client privilege).

⁵ This requirement alone demonstrates that the privilege cannot attach simply because a communication is made between co-defendants, without counsel. Such a view would effectively give co-conspirators and co-defendants a blanket license to communicate among themselves in absolute secrecy. No court has read the privilege so broadly.

CONCLUSION

At the time that Defendant Price sent or received the emails that he has directed his former employer to withhold, his employer had an unambiguous email and computer usage policy that deprived Mr. Price of any expectation of privacy in non-work-related communications transmitted over the firm's network. He, like other employees, agreed to abide by the policy. For that reason, all of the documents on Mr. Price's privilege logs should be produced.

Alternatively, even if Defendant Price could reasonably have expected that communications sent or received over his work email account would remain confidential, he is withholding communications with his co-Defendants to which no valid claim of privilege applies. The Court should at a minimum order him to produce these communications.

Respectfully submitted,

/s/ Benjamin J. Razi

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Dated: September 10, 2010

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on September 10, 2010, I caused a copy of the foregoing Plaintiff's Memorandum of Points and Authorities in Support of Motion to Compel Production of Third-Party Documents Withheld By Defendant Price to be served via CaseFileXpress on the following counsel:

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/s/ Benjamin J. Razi

Benjamin J. Razi

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AFFIDAVIT OF BENJAMIN J. RAZI
IN SUPPORT OF PLAINTIFF'S MOTION TO COMPEL PRODUCTION OF
THIRD-PARTY DOCUMENTS WITHHELD BY DEFENDANT PRICE

I, Benjamin J. Razi, being duly sworn, do hereby state as follows:

1. I am a partner in the law firm of Covington & Burling LLP, 1201 Pennsylvania Avenue, NW, Washington, D.C. 20004, which, along with Regan Zambri & Long, PLLC, 1919 M Street, NW, Suite 350, Washington, D.C. 20036, represents Plaintiff Estate of Robert E. Wone ("Mrs. Wone") in this matter. As a result of my work on this case, I have personal knowledge of the matters described herein.
2. On November 25, 2008, Mrs. Wone filed this wrongful death suit against Defendants Joseph R. Price, Victor J. Zaborsky, and Dylan M. Ward.
3. On January 9, 2009, before the Court stayed this action, counsel for Mrs. Wone served a third-party document subpoena on Defendant Price's former employer, seeking, among other things, all documents relating to Robert Wone, including his murder and/or

the investigation into his murder. A true and correct copy of that document subpoena is attached hereto as Exhibit 1.

4. On February 6, 2009, Defendant Price's former employer began a rolling production of responsive documents. A true and correct copy of a letter dated February 6, 2009 from D. Jacques Smith, counsel for Mr. Price's former employer, enclosing the initial document production is attached hereto as Exhibit 2. As reflected in the letter, Defendant Price reviewed these documents for privilege prior to their production and produced a log identifying the documents he had instructed his former employer to withhold from production.

5. Defendant Price's former employer made subsequent document productions subject to the same procedure and, on March 25, 2009, Defendant Price provided two additional privilege logs.

6. Through counsel, Mrs. Wone specifically reserved the right to contest any claims of privilege made by Mr. Price with respect to the documents produced by Defendant Price's former employer. For instance, attached hereto as Exhibit 3 is a true and correct copy of a letter dated April 8, 2009 from my colleague, Daniel Suleiman, to Heather Nelson, counsel for Defendant Price, specifically reserving Mrs. Wone's rights to challenge Defendant Price's privilege claims.

7. Due to the Court-ordered stay, there was no discovery activity in this case from February 26, 2009 until June 29, 2010, when Judge Leibovitz rendered verdicts of acquittal in the related criminal case.

8. On July 1, 2010, after the conclusion of the criminal case, Mrs. Wone served Defendant Price's former employer with a second subpoena seeking copies of any written

policies governing email or computer usage by their personnel between 2004 and 2009. A true and correct copy of this subpoena is attached hereto as Exhibit 4.

9. In response to the July 1, 2010 subpoena, Defendant Price's former employer produced, among other documents, two copies of its "Computer Network and Telephone Usage Policy Statement," dated April 12, 2005 and January 1, 2007, as well a March 29, 2004 email to all members of the "DC Office" attaching a copy of the policy then in effect. True and correct copies of the April 12, 2005 and January 1, 2007 computer policies are attached hereto as Exhibits 5 and 6, respectively. A true and correct copy of the March 29, 2004 email, with the 2003 policy attached, is attached hereto as Exhibit 7.

10. Throughout July and August, 2010, counsel for Mrs. Wone corresponded and conducted several telephone conferences with Defendant Price's counsel regarding the documents that Defendant Price directed his former employer to withhold from production in this case. Along with my colleagues, I participated in meet-and-confer teleconferences with Mr. Price's counsel on July 9 and July 23. As reflected in an email dated July 12, 2010 and letters dated July 30, 2010 and August 3, 2010, during these calls, we explained our concerns regarding Defendant Price's privilege assertions. Copies of the email and letters are attached hereto as Exhibits 8-10, respectively.

11. As a result of our meet-and-confer discussions, Defendant Price withdrew his claims of privilege with respect to a relatively small number of the documents that previously had been withheld. And, on August 19, 2010, counsel provided revised versions of Defendant Price's privilege logs describing the documents withheld from the document production at the request of Defendant Price. Attached hereto as Exhibits 11-13 are true and correct copies of the

logs identifying the documents that Defendant Price is presently withholding on grounds of privilege.


12. By letter dated August 16, 2010, Defendant Price -- through counsel -- indicated that he was standing by the remainder of his privilege claims. A true and correct copy of the August 16, 2010 letter from Defendant Price's counsel is attached hereto as Exhibit 14.

13. The central focus of the instant motion to compel are email communications between and among the Defendants in the days, weeks, and months surrounding Robert Wone's murder in Defendants' home on August 2, 2006. Accordingly, for the convenience of the Court and the parties, we have prepared excerpts of Mr. Price's privilege logs, reflecting the 45 communications sent between or among the Defendants between June and November 2006 that Defendant Price is continuing to withhold based on claims of privilege. That excerpted version of the privilege logs is attached as Exhibit 15.

14. On December 15, 2008, Mrs. Wone served her First Set of Interrogatories on the Defendants. Defendants' obligation to respond was stayed pending the resolution of the related criminal trial. After the stay was lifted, the Defendants served their interrogatory responses on August 20, 2010. In those responses, each of the three Defendants declined to respond to nearly all of Mrs. Wone's interrogatories, citing their rights under the Fifth Amendment to the Constitution of the United States. Attached hereto as Exhibits 16-18 are true and correct copies of the Defendants' responses to Mrs. Wone's First Set of Interrogatories.

* * * * *

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information, and belief.


Benjamin J. Razi

SWORN TO AND SUBSCRIBED

before me this 8th day of September, 2010



Notary Public

My Commission Expires _____
MARIA P. CHAVEZ
Notary Public, District of Columbia
My Commission Expires January 14, 2015

CERTIFICATE OF SERVICE

I hereby certify that on September 10, 2010, I caused a copy of the foregoing Affidavit of Benjamin J. Razi in Support of Plaintiff's Motion to Compel Production of Documents By Defendant Price to be served via CaseFileXpress on the following counsel:

<p>Craig D. Roswell Brett A. Buckwalter Heather B. Nelson Niles, Barton, & Wilmer LLP 111 S. Calvert Street, Suite 1400 Baltimore, MD 21202 cdroswell@nilesbarton.com hbnelson@nilesbarton.com babuckwalter@nilesbarton.com</p> <p><i>Counsel for Defendant Joseph Price</i></p>	<p>Frank F. Daily Sean P. Edwards Larissa N. Byers The Law Office of Frank F. Daily, P.A. 11350 McCormick Road Executive Plaza III, Suite 704 Hunt Valley, MD 21031 info@frankdailylaw.com</p> <p><i>Counsel for Defendant Victor Zaborsky</i></p>
<p>David Schertler Robert Spagnoletti Schertler & Onorato LLP 601 Pennsylvania Ave., NW Washington, D.C. 20004 dschertler@schertlerlaw.com rspagnoletti@schertlerlaw.com</p> <p><i>Counsel for Defendant Dylan M. Ward</i></p>	<p>D. Jacques Smith, Esq. Randall A. Brater, Esq. Arent Fox LLP 1050 Connecticut Avenue, NW Washington, D.C. 20036-5339</p> <p><i>Counsel for Non-Party Arent Fox LLP (Served by Email and Hand Delivery)</i></p>

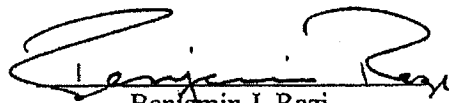

Benjamin J. Razi

Exhibit 1

SUBPOENA

Superior Court of the District of Columbia

CIVIL DIVISION

500 Indiana Avenue, N.W., Room JM-170
Washington, DC 20001 Telephone (202) 879-1133

Estate of ROBERT E. WONE
Plaintiff

SUBPOENA IN A CIVIL CASE

v.

JOSEPH R. PRICE, VICTOR J. ZABORSKY and
DYLAN M. WARD

CASE NUMBER: 008315-08
Calendar 7

Defendants

TO: Arent Fox LLP,
1050 Connecticut Avenue, NW
Washington, D.C. 20036-5339

YOU ARE COMMANDED to appear at the place, date and time specified below to testify in the above case.

COURTROOM	DATE	TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

--	--	--

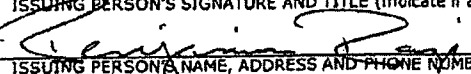
YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (*list documents or objects*):

DOCUMENTS OR OBJECTS		
SEE EXHIBIT A		
PLACE OF PRODUCTION	DATE	TIME
Covington & Burling LLP, 1201 Pennsylvania Ave., NW, Washington, D.C. 20004-2401	January 23, 2009	12:00 PM

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE	TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. SCR-CIV 30(b)(6).

ISSUING PERSON'S SIGNATURE AND TITLE (indicate if attorney for plaintiff or defendant)	DATE
 Attorney for Plaintiff	January 9, 2009
ISSUING PERSON'S NAME, ADDRESS AND PHONE NUMBER	
Benjamin J. Razi, Covington & Burling LLP, 1201 Pennsylvania Ave., NW, Washington, D.C. 20004-2401; telephone (202) 662-6000	

(SEE RULE 45, SUPERIOR COURT RULES OF CIVIL PROCEDURE ON REVERSE)
WHITE-ORIGINAL YELLOW-FOR RETURN SERVICE PINK-OFFICE COPY

Authorization as required by D.C. Code §14-307 and Brown v. U.S., 567 A. 2d 426 (D.C. 1989), is hereby given for issuance of a subpoena for medical records concerning a person who has not consented to disclosure of the records and has not waived the privilege relating to such records.

The Honorable Judge Hedge
Judge to Whom Case is Assigned

PROOF OF SERVICE

SERVED 1-9-09 DATE 1050 CONN. AVE NW, WASH DC. 20036 PLACE ARENT ESX LLP

SERVED ON (PRINT NAME) _____ MANNER OF SERVICE B-I HAND
(attach return receipt if service was made by registered or certified mail)

SERVED BY (PRINT NAME) WILLIAM CHARYK TITLE MANAGING PARTNER

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on 1-9-09 DATE

[Signature]
SIGNATURE OF SERVER

ADDRESS OF SERVER
1201 PA AVE NW

Rule 45, SUPERIOR COURT RULES OF CIVIL PROCEDURE, Sections C & D:

(c) Protection of Persons Subject To Subpoenas.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and reasonable attorney's fees.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this Rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy materials or inspect the premises except pursuant to an order of the Court. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the Court by which a subpoena was issued shall quash or modify the subpoena if it
(i) fails to allow reasonable time for compliance,
(ii) requires a person who is not a party or an officer of a party to travel to a place more than 25 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this Rule, such a person may in order to attend trial be commanded to travel from any such place to the place of trial, or
(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or
(iv) subjects a person to undue burden.

(B) If a subpoena
(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or
(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or
(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 25 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the Court may order appearance or production only upon specified conditions.

(d) Duties in Responding to Subpoena.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications or things not produced that is sufficient to enable the demanding party to contest the claim.

EXHIBIT A

Pursuant to Rule 45 of the Superior Court Rules of Civil Procedure, Plaintiff Estate of Robert E. Wone hereby propounds this subpoena to produce documents. This subpoena calls for you to produce the documents described under the heading "Documents Requested" below, in accordance with the following "Instructions" and "Definitions."

INSTRUCTIONS

1. The response to each request for documents ("Request") shall include all documents within your possession, custody, or control. A document is within your "possession, custody, or control" if it is in your physical custody; or, if you own it in whole or in part; or, if you have a right by contract, statute, or otherwise to use, inspect, examine, or copy it on any terms; or, if you have, as a practical matter, the ability to use, inspect, examine, or copy such document.

2. The response to each Request shall state, with respect to each item or category, that inspection and related activities will be permitted as requested, unless the Request is objected to, in which event the reason(s) for objection shall be stated. If objection is made to part of an item or category, the part shall be specified; documents responsive to the remainder of the Request shall be produced. Any such objection shall not extend the time within which you must otherwise answer or respond to a Request to which no specific objection has been made.

3. If you contend that an otherwise discoverable document would be excludable, state the reason(s) for such objection or grounds for exclusion and identify each person having knowledge of the factual basis, if any, on which the objection or ground is asserted.

4. Whenever a Request calls for a document claimed by you to be privileged, identify the document and the basis for the claimed privilege in writing, with sufficient factual detail to enable the Court to determine whether such document is in fact protected by an applicable privilege.

DEFINITIONS

The following definitions and rules of construction apply to these Requests:

1. "Document" is intended to be synonymous in meaning and equal in scope to the usage of this term in Rule 34(a) of the Superior Court Rules of Civil Procedure, including, without limitation, electronic mail and other electronic or computerized data compilations. A draft or non-identical copy is a separate document within the meaning of this term.

2. "Relating to" means concerning, referring to, describing, evidencing, or constituting.

3. The use of the singular form of any word includes the plural and vice versa.

DOCUMENTS REQUESTED

1. All documents relating to Robert Wone, including, without limitation, his murder and/or the investigation into his murder.

2. All documents produced by or on behalf of Arent Fox LLP to the United States Attorney's Office for the District of Columbia and/or the District of Columbia Metropolitan Police Department in connection with the investigation into Robert Wone's murder.

3. All communications, including, without limitation, electronic mail communications, between Joseph Price and Dylan Ward, whether or not such communications also include third parties.

4. All communications, including, without limitation, electronic mail communications, during 2006 between Joseph Price and Michael Price, whether or not such communications also include third parties.

5. All photographs, images, videos, or recordings that (1) are stored on any computers or databases assigned to or used by Joseph Price; and (2) depict violence or contain sexual content.

CERTIFICATE OF SERVICE

I hereby certify that on January 9, 2009, I caused a copy of the foregoing Subpoena to Arent Fox LLP to be served by email and First Class Mail (postage prepaid) on the following counsel:

Bernard S. Grimm, Esq.
Cozen O'Connor
The Army and Navy Club Building
Suite 1100
1627 I Street, NW
Washington, D.C. 20006-4007

Counsel for Defendant Joseph R. Price

David Schertler, Esq.
Danny C. Onorato, Esq.
Robert Spagnoletti, Esq.
Schertler & Onorato, L.L.P.
601 Pennsylvania Avenue, NW
North Building - 9th Floor
Washington, D.C. 20004-2601

Counsel for Defendant Dylan M. Ward

Thomas G. Connolly, Esq.
Amy E. Richardson, Esq.
Harris, Wiltshire & Grannis LLP
1200 Eighteenth Street, NW
12th Floor
Washington, D.C. 20036-2506

Counsel for Defendant Victor J. Zaborsky

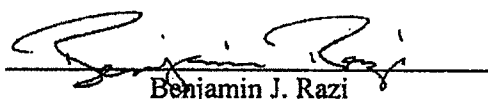

Benjamin J. Razi

Exhibit 2

Arent Fox

February 6, 2009

VIA MESSENGER

Benjamin J. Razi, Esq.
Covington & Burling LLP
1201 Pennsylvania Avenue, NW
Washington, DC 20004-2401

D. Jacques Smith
Attorney
202.857.6154 DIRECT
202.857.6395 FAX
smith.jacques@arentfox.com

Randall A. Brater
Attorney
202.715.8472 DIRECT
202.857.6395 FAX
brater.randall@arentfox.com

Re: Third Party Subpoena to Arent Fox LLP
Estate of Robert E. Wone v. Joseph R. Price, et al.
Case No. 008315-08

Dear Ben:

Pursuant to the agreement among all interested parties, enclosed please find all material responsive to category 2 of Plaintiff Estate of Robert E. Wone's January 9, 2009 Subpoena *Duces Tecum* (the "subpoena") to third party Arent Fox LLP. As agreed, certain communications of a personal nature produced in response to the government subpoena in September 2006, but that are not relevant to matters in this proceeding, will not be produced. We will retain these communications and will make them available to you for review at Arent Fox upon request. In addition, and as also agreed, all communications and documents related to Arent Fox's clients or business practices that were produced in response to the government subpoena will not be produced. Further, material deemed privileged by Defendant's counsel will not be produced. A copy of the privilege log containing such material, which Defendant's counsel prepared, is enclosed for your review.

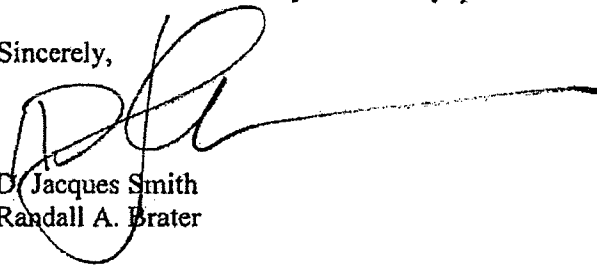
Additionally, enclosed is material dated on or before August 4, 2006 that is responsive to category 5 of the subpoena.

Of course, we will retain all material not produced in response to the subpoena should it be needed at a later date. To the extent the parties enter into a Protective Order, this material is produced pursuant thereto.

Arent Fox

Please contact us should you have any questions. Thank you.

Sincerely,



D. Jacques Smith
Randall A. Brater

JDT/

Enclosures

cc: Craig D. Roswell, Esq. (*via Fed Ex*)

Exhibit 3

COVINGTON & BURLING LLP

1201 PENNSYLVANIA AVENUE NW
WASHINGTON, DC 20004-2401
TEL 202.662.6000
FAX 202.662.6291
WWW.COV.COM

BEIJING
BRUSSELS
LONDON
NEW YORK
SAN DIEGO
SAN FRANCISCO
SILICON VALLEY
WASHINGTON

DANIEL SULEIMAN
TEL 202.662.5350
FAX 202.778.5350
DSULEIMAN @ COV.COM

April 8, 2009

VIA EMAIL AND FIRST CLASS MAIL

Heather B. Nelson
Niles Barton & Wilmer LLP
111 South Calvert Street, Suite 1400
Baltimore, MD 21202

**Re: Estate of Robert E. Wone v. Joseph R. Price, et al.,
2008 CA 008315-08 B (D.C. Superior Court)**

Dear Heather:

I am writing to request that you correct deficiencies in the privilege logs produced by Mr. Price on February 6 and March 25, 2009, relating to document productions by Arent Fox LLP. As you know, the Court has stayed this action pending the criminal trial. Nevertheless, we hope and expect that you will bring Mr. Price's privilege logs into compliance with the D.C. Rules of Civil Procedure promptly, so that, once the stay is lifted, Mrs. Wone is in a position to contest any disputed claims of privilege.

Rule 45(d)(2) provides that, "When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim." Super. Ct. Civ. R. 45(d)(2) (emphasis added); *see also Crane v. Crane*, 657 A.2d 312, 317 n.10 (D.C. 1995). Each of Mr. Price's three privilege logs clearly fails to meet this standard. None of these logs provides any description whatsoever of the subject matter of the logged communication or document, much less a description that is sufficient to enable Mrs. Wone to contest the claim of privilege. In these circumstances, it is plain that Mr. Price has failed to comply with Rule 45(d)(2) and that his privilege logs are "clearly inadequate" and "fall woefully short of what is required." *Alexander v. FBI*, 186 F.R.D. 102, 106-07 (D.D.C. 1998).

In addition to the threshold failure of Mr. Price to comply with his obligations under Rule 45(d)(2), we have serious concerns about the substantive claims of privilege over numerous communications identified on the three privilege logs. For example, the claim of privilege over dozens of communications between Mr. Price and Mr. Ward is inherently suspect,

COVINGTON & BURLING LLP

Heather B. Nelson
April 8, 2009
Page 2

because neither of these men was acting as counsel to the other. This is especially true in this case, which involves an alleged conspiracy between Messrs. Price and Ward.

Numerous other documents have been withheld for which there appears to be no author, sender, or recipient. Without a description of the subject matter of these documents, it is impossible for Mrs. Wone to evaluate the asserted privilege claim. By the same token, a number of individuals have been identified on the logs only by their last names (e.g., Glass and Lester). Without a more complete identification of these individuals, Mrs. Wone cannot evaluate whether, for example, any asserted claims of privilege have been waived. Accordingly, in addition to requesting that you provide adequate descriptions as required by Rule 45(d)(2), we also request that you provide for each individual identified on the logs his or her full name and position.

As a more general matter, we note that documents like those at issue here -- those in the possession of a third-party to the attorney-client relationship -- may not be protected from discovery at all. See, e.g., *Long v. Marubeni America Corp.*, No. 05 Civ. 639 (GEL)(KNF), 2006 WL 2998671 (S.D.N.Y. Oct. 19, 2006) (e-mails sent to counsel from work computer not protected by attorney-client privilege); *Scott v. Beth Israel Med. Ctr.*, 847 N.Y.S.2d 436 (N.Y. Sup. Ct. 2007) (same). Mrs. Wone reserves the right to challenge all of Mr. Price's privilege claims relating to documents in the possession of Arent Fox at the appropriate time.

We look forward to hearing from you regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Suleiman", with a horizontal line extending to the right.

Daniel Suleiman

cc: Craig D. Roswell, Esq.
Benjamin J. Razi, Esq.

Exhibit 4

SUBPOENA

Superior Court of the District of Columbia

CIVIL DIVISION

500 Indiana Avenue, N.W., Room JM-170
Washington, DC 20001 Telephone (202) 879-1133

Estate of ROBERT E. WONE
Plaintiff

v.

JOSEPH R. PRICE, VICTOR J. ZABORSKY and
DYLAN M. WARD

Defendants

SUBPOENA IN A CIVIL CASE

CASE NUMBER: 008315-08
Calendar 7

TO: Arent Fox LLP
1050 Connecticut Avenue, NW
Washington, D.C. 20036-5339

YOU ARE COMMANDED to appear at the place, date and time specified below to testify in the above case.

COURTROOM	DATE	TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

--	--	--

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (*list documents or objects*):

DOCUMENTS OR OBJECTS	DATE	TIME
SEE EXHIBIT A		
PLACE OF PRODUCTION		
Covington & Burling LLP, 1201 Pennsylvania Ave., NW, Washington, D.C. 20004-2401	July 8, 2010	12:00 PM

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE	TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. SCR-CIV 30(b)(6).

ISSUING PERSON'S SIGNATURE AND TITLE (Indicate if attorney for plaintiff or defendant)	DATE
Attorney for Plaintiff	July 1, 2010
ISSUING PERSON'S NAME, ADDRESS AND PHONE NUMBER	
Benjamin J. Razi, Covington & Burling LLP, 1201 Pennsylvania Ave., NW, Washington, D.C. 20004-2401; telephone (202) 662-6000	

(SEE RULE 45, SUPERIOR COURT RULES OF CIVIL PROCEDURE ON REVERSE)

WHITE-ORIGINAL YELLOW-FOR RETURN SERVICE PINK-OFFICE COPY

Authorization as required by D.C. Code §14-307 and Brown v. U.S., 567 A. 2d 426 (D.C. 1989), is hereby given for issuance of a subpoena for medical records concerning a person who has not consented to disclosure of the records and has not waived the privilege relating to such records.

The Honorable Judge Hedge
Judge to Whom Case is Assigned

PROOF OF SERVICE

SERVED 07/01/10 DATE 1050 Connecticut Ave. N.W. PLACE

SERVED ON (PRINT NAME) Bill Charyk MANNER OF SERVICE By Hand
(attach return receipt if service was made by registered or certified mail)

Bill Charyk

SERVED BY (PRINT NAME) <u>Fredrick Speight</u>	TITLE <u>Outside Messenger</u>
---------------------------------------------------	-----------------------------------

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on 07/01/10 DATE

Fredrick Speight
SIGNATURE OF SERVER
1201 Penn. Ave. N.W.
ADDRESS OF SERVER
Washington, D.C. 20044

Rule 45, SUPERIOR COURT RULES OF CIVIL PROCEDURE, Sections C & D:

(c) Protection of Persons Subject To Subpoenas.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and reasonable attorney's fees.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this Rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy materials or inspect the premises except pursuant to an order of the Court. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the Court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance,

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 25 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this Rule, such a person may in order to attend trial be commanded to travel from any such place to the place of trial, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 25 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the Court may order appearance or production only upon specified conditions.

(d) Duties In Responding to Subpoenas.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications or things not produced that is sufficient to enable the demanding party to contest the claim.

EXHIBIT A

Pursuant to Rule 45 of the Superior Court Rules of Civil Procedure, Plaintiff Estate of Robert E. Wone hereby propounds this subpoena to produce documents. This subpoena calls for you to produce the documents described under the heading "Documents Requested" below, in accordance with the following "Instructions."

INSTRUCTIONS

1. The response to each request for documents ("Request") shall include all documents within your possession, custody, or control. A document is within your "possession, custody, or control" if it is in your physical custody; or, if you own it in whole or in part; or, if you have a right by contract, statute, or otherwise to use, inspect, examine, or copy it on any terms; or, if you have, as a practical matter, the ability to use, inspect, examine, or copy such document.

2. If a Request calls for a document claimed by you to be privileged, identify the document and the basis for the claimed privilege in writing, with sufficient factual detail to enable the Court to determine whether such document is in fact protected by an applicable privilege.

DOCUMENTS REQUESTED

1. Documents sufficient to show the policy or policies of Arent Fox LLP in effect from 2004 to 2009 relating to use of the firm's computer, telephone, and electronic mail systems by firm personnel, including but not limited to policies regarding (1) use of such systems for personal communications unrelated to the business of the firm, (2) the ability of the firm to monitor the use of such systems, (3) the ownership of records and communications created or stored on such systems, and (4) the confidentiality or privacy of records and communications created or stored on such systems.

Exhibit 5

ARENT FOX PLLC
Technology Services Department
Computer Network and Telephone Usage Policy Statement
(Revised: April 12, 2005)

To maximize the level of performance, support and security of our telephone and computer systems, the Firm has established the following policies regarding the use of its Computer Network and Telephone resources. Your compliance with these policies will ensure that the Technology Services Department can deliver to you and the Firm's clients the highest level of secure and reliable service. Please contact the Chief Technology Officer¹ with any questions you may have regarding these policies.

1. USE OF COMPUTER AND TELEPHONE NETWORKS

The computer and telephone networks operated and supported by Arent Fox are in place to be used for Firm-related business purposes. While reasonable personal use of these resources is appropriate and permissible, excessive or unlimited personal use is not. We rely upon your good judgment and restraint to avoid abuse of this privilege. Personal use of phones and computers should be limited in duration and should not interfere with work schedules or work production. If necessary, Firm management and supervisors have the discretion to set more specific guidelines where they feel such action is required and on a case-by-case basis, if that is determined to be appropriate.

Please note that all hardware, software, and data (including e-mail and voice mail messages) are the property of the Firm or its clients, and, as such, is subject to review if deemed necessary to protect the Firm's or its clients' interests.

2. SOFTWARE

(a) Licensing: Use or replication of any software package in violation of the manufacturer's software license as specified by the manufacturer is prohibited. Any fines or penalties incurred as a result of the use of non-licensed or improperly licensed software are the sole responsibility of the individual involved. If you are unsure whether the Firm prohibits any desired use or replication of any software package, please contact the Chief Technology Officer.

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(c) Request for Additional Hardware/Software: If you would like to request the installation of additional work-related hardware or software beyond the standard desktop configuration, please contact the Chief Technology Officer. It will be the responsibility of the applicant to provide satisfactory business justification for such additional hardware or software. Department Manager authorization may be required. A client/matter charge number also may be required for purchase of the desired item.

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All Firm employees will be assigned a unique UserID and password. Any use of our network under the assigned UserID is the responsibility of the individual assigned that UserID. The number of concurrent or simultaneous login sessions for a given user will be limited and determined by the Technology Services Department. Requests for additional concurrent logins should be addressed to the Technology Solutions Center with appropriate business purpose justification.

¹ Bob Young, Young.Robert@arentfox.com, (202) 857-6324.

² Extension 7777 (202-775-7777 from outside the office) in DC and extension 3333 (212-492-3333) in NY.

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Password theft is a primary means of network security violations, so please make every effort to keep your password secret. **Never give out your password.** If you suspect that your password has been compromised, notify the Technology Services Department immediately so we may assist you in changing it.

We encourage you to lock your computer screen during periods that you are not actively using it and/or away from your desk. It is very important to either log off the network or lock down your PC when leaving for the day or when leaving your desk for any substantial amount of time. Users who fail to comply with these procedures create obvious security risks.

In addition, to enhance the security of the network and to enable the Firm to detect and trace any security breaches or other instances of unauthorized access to network data, an automatic audit trail of all user's activities on the network may be generated. If you suspect unauthorized network access please contact the Technology Solutions Center immediately.

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Exhibit 6

ARENT FOX LLP

Technology Services Department Computer Network and Telephone Usage Policy Statement

(Revised: January 1, 2007)

To maximize the level of performance, support and security of our telephone and computer systems, the Firm has established the following policies regarding the use of its Computer Network and Telephone resources. Your compliance with these policies will ensure that the Technology Services Department can deliver to you and the Firm's clients the highest level of secure and reliable service. Please contact the Chief Technology Officer¹ with any questions you may have regarding these policies.

1. USE OF COMPUTER AND TELEPHONE NETWORKS

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(b) Application Support: The Technology Services Department provides limited-to-full support of the software applications installed on its network depending on the support classification for the application.

Level 1 (or Full) support is provided for those applications considered to be Firm basic standards. This support includes formal training and full 24-hour 7-day per week Technology Solutions Center² troubleshooting support.

Level 2 support (during normal Firm working hours, as time and resources allow) is provided for those applications considered to be business-need and used by a specific sub-group of the user community to perform certain functions in support of their practice(s). This support level includes troubleshooting assistance and guidance in operational use (which may or may not include formal training).

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Password theft is a primary means of network security violations, so please make every effort to keep your password secret. **Never give out your password.** If you suspect that your password has been compromised, notify the Technology Services Department immediately so we may assist you in changing it.

We encourage you to lock your computer screen during periods that you are not actively using it and/or away from your desk. It is very important to either log off the network or lock down your PC when leaving for the day or when leaving your desk for any substantial amount of time. Users who fail to comply with these procedures create obvious security risks.

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We thank you in advance for your cooperation. If we all follow the procedures outlined above we will contribute significantly to the effectiveness of our Technology Services Department and our telecommunications network.

Exhibit 7

Williams, David C

From: Young, Robert M.
Sent: Monday, March 29, 2004 3:38 PM
To: DC OFFICE; NY OFFICE
Subject: Firm Computer Network and Telephone Usage Policy

Importance: High

Attachments: ADMIN_25_1.nrl; PBrush

Recently, an Arent Fox employee attached an unauthorized piece of hardware to our network. This equipment disrupted or degraded service to several computers on the 6th floor in the DC office for several days and consumed significant IT Department resources to track it down, remove it and alleviate the problems it created.

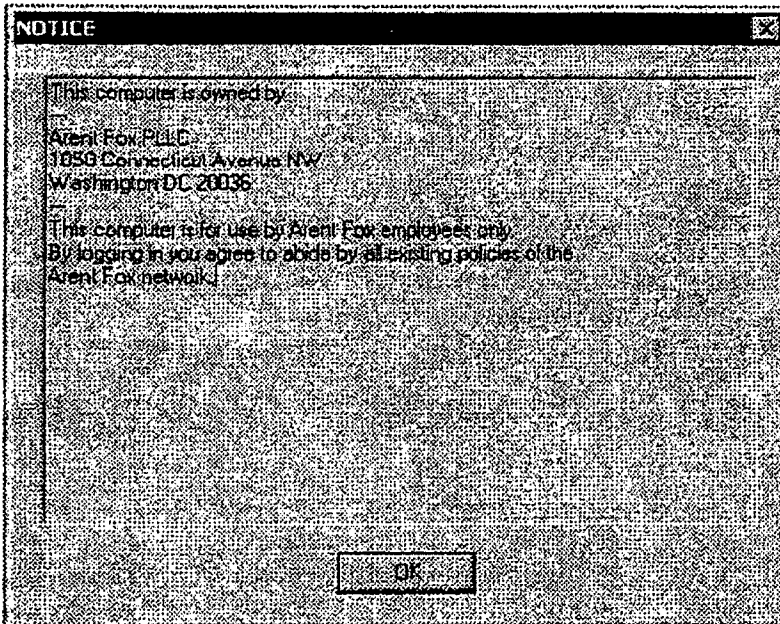
Please be reminded that Firm policy, as described in the Firm Computer Network and Telephone Usage Policy Statement (attached), specifically prohibits end-users from installing software or hardware on our network. If you are contemplating attaching a piece of hardware or installing software please speak with me first. All approved installations will be performed by the IT Department.



ADMIN_25_1.nrl

This policy was put in place several years ago to protect the Firm's network and data from viruses, worms and other ill-intentioned software that is all too prevalent these days, as well as to ensure an optimal computing environment for our user community.

Every time you log into your Firm-assigned computer you are presented with the following notice:



The policies this notice refers to include the policy stated in the document attached above. When you click

By clicking the "OK" button on this notice, you agree to abide by these policies.

Please make every effort to adhere to these policies...both literally and in spirit...to protect yourself, your co-workers and our clients.

Thank you

ARENT FOX KINTNER PLOTKIN & KAHN, PLLC
Information Technology Department
Computer Network and Telephone Usage Policy Statement
(Revised: July 1, 2003)

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Exhibit 8

From: Suleiman, Daniel
Sent: Monday, July 12, 2010 5:59 PM
To: 'hbnelson@nilesbarton.com'
Cc: 'cdroswell@nilesbarton.com'; Razi, Benjamin
Subject: Wone v. Price, et al.

Dear Heather,

This will confirm the discussion we had this afternoon, which followed up on the meet and confer call that we conducted last Friday, July 9. During the meet and confer, my colleagues and I set forth certain concerns that we have with Mr. Price's privilege logs, which were produced on February 6 and March 25, 2009. In addition to explaining that as a threshold matter we believe all of the documents withheld by Mr. Price to be discoverable on account of the fact that they were sent or created on his Arent Fox computer (with no reasonable expectation of privacy), we also explained our concerns regarding privilege assertions that have been made over documents that are plainly not privileged, such as communications between Mr. Price and Mr. Ward's family, between and among the three defendants, from Mr. Price to himself, and those for which no sender or recipient is identified. We also reiterated our concerns over the general lack of description on the logs, including but not limited to the identification of third parties who are copied on certain of the withheld communications. We first set forth these concerns in my letter to you dated April 8, 2009.

During our meet and confer, you acknowledged our concerns, said that you would be re-examining Mr. Price's privilege claims in light of these concerns, and promised to provide us with revised and more detailed logs by COB today. This afternoon, however, you called to say that you would be unable to provide the revised logs until on or before Thursday, July 15; you also said that at or around the same time Mr. Price would be producing documents that had previously been withheld on grounds of privilege. On behalf of Mrs. Wone, I agreed to the extension until Thursday.

I trust that you agree that this accurately reflects our discussions. If you do not, please let me know right away.

Sincerely,
Dan

Daniel Suleiman
Covington & Burling LLP
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
(202) 662-5350 (phone)
(202) 778-5350 (fax)

This message is from a law firm and may contain information that is confidential or legally privileged. If you are not the intended recipient, please immediately advise the sender by reply e-mail that this message has been inadvertently transmitted to you and delete this e-mail from your system. Thank you for your cooperation.

Exhibit 9

COVINGTON & BURLING LLP

1201 PENNSYLVANIA AVENUE NW
WASHINGTON, DC 20004-2401
TEL 202.662.6000
FAX 202.662.6291
WWW.COV.COM

BEIJING
BRUSSELS
LONDON
NEW YORK
SAN DIEGO
SAN FRANCISCO
SILICON VALLEY
WASHINGTON

(202) 662-5335

WRITER'S DIRECT DIAL NUMBER

July 30, 2010

VIA EMAIL

Brett A. Buckwalter
Heather B. Nelson
Niles, Barton & Wilmer LLP
111 South Calvert Street, Suite 1400
Baltimore, MD 21202

Re: Wone v. Price, et al.

Dear Brett and Heather:

We are writing to follow up on our meet and confer call of last Friday, July 23.

First, as requested, we are enclosing a copy of the transcript of the September 18, 2009 hearing before Judge Hedge. As you will see, the Court ordered that, "within 45 days of the . . . verdict all discovery must be responded to that is outstanding." Tr. at 6.

Second, we understand from the call that you have agreed to redact attorney-client privileged communications from e-mails between Mr. Price and Mr. Ward or among all three defendants, over which you currently assert a joint defense privilege. For example, if one defendant forwarded an attorney-client communication and added commentary of his own, we understand that you will redact the forwarded communication and produce the communication between or among the defendants. You also agreed to provide us with revised logs in light of (1) our concern over the amount of description provided and (2) your representation that the logs continue to include documents which had already been produced to us, in particular, a subset of the "AFAC" documents. Please produce these documents and provide your revised logs by no later than next Thursday, August 5, 2010.

Third, you agreed to provide further description regarding the identity of the individuals listed on the logs. In some cases, like Laura Lester and Emily Thorne, you have provided the full name but not an indication of how the listed privilege applies. Lester and Thorne, we note, were Arent Fox attorneys at the time, so it is not clear to us that they could have been in an attorney-client relationship with Mr. Price. Other names listed which are not known to us are "Fisher," E.Glass, and Mark Allen Smith.

COVINGTON & BURLING LLP

Brett A. Buckwalter
Heather B. Nelson
July 30, 2010
Page 2

Finally, we have reviewed *U.S. v. Clyburn*, the case you cited on the call for the proposition that D.C. Code § 14-306 applies to documents. We do not agree with your reading of *Clyburn*; the case pertains only to testimony and nowhere states that documents can be afforded protection under § 14-306. We therefore continue to believe that none of the communications between Mr. Price and Mr. Zaborsky can be withheld pursuant to § 14-306.

We look forward to hearing back from you soon about these issues.

Regards,



Brett C. Reynolds*

Enclosure

cc: Craig D. Roswell
Benjamin J. Razi
Daniel Suleiman

* Admitted to the bar of Illinois; admission in the District of Columbia is pending. Practice supervised by principals of the firm.

Exhibit 10

Brett A. Buckwalter • Partner

(410) 783 - 6385

Fax (410) 783 - 6445

babuckwalter@nilesbarton.com

Admitted to practice in Maryland and the District of Columbia

August 3, 2010

Via Email and First Class U.S. Mail

Brett C. Reynolds, Esquire
Benjamin J. Razi, Esquire
Covington & Burling LLP
1201 Pennsylvania Ave NW
Washington, DC 20004

Re: Civil Action No. 0008315-08, Superior Court of the District of Columbia
*Estate of Robert E. Wone, by Katherine E. Wone v. Joseph R. Price, Victor J. Zaborsky
and Dylan M. Ward*

Dear Counsel:

We are in receipt of Mr. Reynolds' correspondence dated July 30, 2010.

Initially, we appreciate your sharing a copy of the September 18, 2009 status hearing transcript with us. Please allow the remainder of this letter to serve as a reply to the specific points raised in your letter.

Foremost, your correspondence reflects a material misunderstanding of a certain portion of our conversation regarding the joint defense privilege as it pertains to communications shared among the three defendants. Specifically, no agreements were reached during the conversation regarding any of the discovery disputes that were discussed. Notwithstanding, I did state that I would consider all of your points, particularly given that I have only recently entered the case. Further, the joint defense privilege applies to all Defendants, and I advised that all Defendants would need to be consulted on such a decision. Among that which I said we would consider is the issue of redacting certain portions of some communications between the Defendants if doing so would maintain the integrity of privileged communications. It was my understanding from your end that you were open to that idea as well, but also did not make any formal commitment. I believe that it was clear from the conversation that neither side intended to formally commit to a course of action.

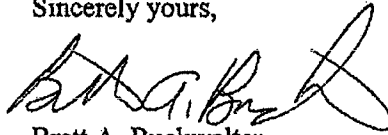
Brett C. Reynolds, Esquire
Benjamin J. Razi, Esquire
August 3, 2010
Page 2

Regarding the descriptions contained in the privilege logs, enclosed please find revised logs reflecting those Arent Fox documents which you have in your possession. Additionally, please note that two of the parties you list in your inquiry, E. Glass and Mark Allen Smith are members and representatives of Equality Virginia. You will be provided substantive responses to your related inquiries in short order.

Finally, we do not agree with your interpretation of *Clyburn* and would be interested in being pointed to any authority supporting your narrow reading of §14-306. Your letter also ignores the spousal communication privilege, which makes plain that the privilege prevents disclosure of confidential spousal communications. See, e.g., *Wolfe v. United States*, 291 U.S. 7, 14 (1934) ("The basis of the immunity given to communications between husband and wife is the protection of marital confidences, regarded as so essential to the preservation of the marriage relationship as to outweigh the disadvantages to the administration of justice which the privilege entails"). We will not withdraw our claims of spousal privilege with respect to confidential communications between Mr. Price and Mr. Zaborsky, and we have been advised by Mr. Zaborsky's attorneys that he also will continue to assert the privilege.

If you would like to discuss these matters further, please let us know.

Sincerely yours,



Brett A. Buckwalter

BAB/nsa
Enclosure

cc: Craig D. Roswell, Esquire
Frank Daily, Esquire

Exhibit 11

**PRIVILEGE LOG – ARENT FOX DISC 5
(AMENDED FOR PRODUCTION ON 7/15/10)
(From Files Entitled “Rob, Robert, and Wone”)
Civil Action No. 0008315-08**

**Key: JDP – Joint Defense Privilege
AC – Attorney Client Privilege
SP – Spousal Privilege
AWP – Attorney Work Product**

“Rob.pst” FOLDER:

Bate's #	Date	Time	Parties	Privilege
A/F 00001- 00002	8/14/06	9:13 AM	Joe Price to Joe Price forwarding attorney work communication/ work product	AWP
A/F 00003- 00006	8/2/07	4:17 PM	Tom Connolly, Esq. to Price, David Schertler, Esq., Kathleen Voelker, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00007- 00011	8/2/07	4:33 PM	From Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00012- 00016	8/2/07	4:38 PM	From Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00017- 00022	8/2/07	4:42 PM	From Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00023- 00028	8/2/07	4:59 PM	Joe Price to Tom Connolly, Esq., David Schertler, Esq., Kathleen Voelker, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00029- 00033	8/2/07	5:24 PM	From Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00034- 00035	8/3/07	3:13 PM	Joe Price to L. Laura Lester, Esq., Esquire re: attorney client communication	AC.
A/F 00034R- 00035R	8/3/07	3:13 PM	Joe Price to L. Laura Lester, Esq., Esquire re: attorney client communication	AC. Redacted.
A/F 00036- 00037	8/13/07	12:17 PM	Joe Price to L. Laura Lester, Esq., Esquire re: attorney client communication	AC.

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(AMENDED FOR PRODUCTION ON 7/15/10)
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Civil Action No. 0008315-08**

Bate's #	Date	Time	Parties	Privilege
A/F 00036R- 00037R	8/13/07	12:17 PM	Joe Price to L. Laura Lester, Esq., Esquire re: attorney client communication	AC. Redacted.
A/F 00038	7/27/08	3:19 PM	From Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., Danny Onorato, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00039- 000040	7/27/08	6:29 PM	From Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00041	7/27/08	9:24 PM	From Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00042	7/27/08	9:59 PM	From Joe Price to Kathleen Voelker, Esq. re: attorney client communication	AC
A/F 00043	11/6/08	8:23 AM	From Joe Price to Joe Price attaching attorney work product	AWP
A/F 00044	11/6/08	8:37 AM	From Joe Price to Tom Connolly, Esq., David Schertler, Esq., Danny Onorato, Esq., Bernard Grimm, Esq., Todryk, Esq., Schoch , Esq. and Richardson, Esq. re: attorney client communication	JDP

“Robert.pst” FOLDER:

Bate's #	Date	Time	Parties	Privilege
A/F 00045	8/12/06	12:53 PM	Kathleen Voelker, Esq. to Joe Price re: attorney client communication	AC
A/F 00046	8/12/06	4:38 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00047- 00048	8/13/06	10:43 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Dylan Ward and Victor Zaborsky re: attorney client communication	JDP
A/F 00049	8/15/06	5:58 PM	David Schertler, Esq. to Kathleen Voelker, Esq., Dylan Ward, Victor Zaborsky, Joe Price re: attorney client communication	JDP
A/F 00050- 00051	8/15/06	10:48 PM	Dylan Ward to Joe Price cc: Victor Zaborsky attaching statement to counsel	JDP
A/F 00052- (2)	8/16/06	8:35 AM	Joe Price to Joe Price attaching attorney work product	AWP

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Bate's #	Date	Time	Parties	Privilege
00053				
A/F 00054	8/16/06	5:17 PM	Joe Price to Kathleen Voelker, Esq. and David Schertler, Esq. re: attorney client communication	JDP
A/F 00055	8/16/06	6:00 PM	Kathleen Voelker, Esq. to David Schertler, Esq., Joe Price re: attorney client communication	JDP
A/F 00056- 00057	8/18/06	8:45 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., Richardson, Esq. re: attorney client communication	JDP
A/F 00058- 00059	8/18/06	9:13 AM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00060- 00061	8/18/06	12:01 PM	David Schertler, Esq. to Joe Price, Kathleen Voelker, Esq., Tom Connolly, Esq. and Richardson, Esq. re: attorney client communication	JDP
A/F 00062- 00063	8/18/06	4:47 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., Richardson, Esq. re: attorney client communication	JDP
A/F 00064	8/28/06	7:58 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. re: attorney client communication	JDP
A/F 00065 (duplicate A/F 00066)	8/28/06	4:02 PM	Joe Price to Victor Zaborsky and Dylan Ward re: Washington Post columnist and article re: investigation	Produced.
A/F 00067- 00068	9/6/06	9:06 AM	Joe Price to Kathleen Voelker, Esq. re: attorney client communication	AC
A/F 00069	9/8/06	3:16 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. re: attorney client communication	JDP
A/F 00070- 00071	9/8/06	3:21 PM	Joe Price to Tom Connolly, Esq., David Schertler, Esq. and Kathleen Voelker, Esq. re: attorney client communication	JDP
A/F 00072	9/11/06	9:22 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. re: attorney client communication	JDP

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Bate's #	Date	Time	Parties	Privilege
A/F 00073	9/11/06	9:23 AM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00074- 00075	9/11/06	9:51 AM	Joe Price to Tom Connolly, Esq., David Schertler, Esq., Kathleen Voelker, Esq. re: attorney client communication	JDP
A/F 00076- 00078	9/11/06	9:55 AM	Joe Price to Tom Connolly, Esq., David Schertler, Esq., Kathleen Voelker, Esq. re: attorney client communication	JDP
A/F 00079- 00080	9/12/06	3:08 PM	Tom Connolly, Esq. to Joe Price re: attorney client communication	JDP
A/F 00081- 00083	9/12/06	3:10 PM	Joe Price to David Schertler, Esq. and Kathleen Voelker, Esq. re: attorney client communication	JDP
A/F 00084- 00086	9/12/06	4:01 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00087- 00089	9/13/06 (2)	5:01 PM	Joe Price to Victor Zaborsky re: wedding photos	SP
A/F 00090- 00092	9/13/06 (4)	5:05 PM	Joe Price to Victor Zaborsky re: wedding photos	SP
A/F 00093- 00096	9/13/06 (2)	5:07 PM	Joe Price to Victor Zaborsky re: wedding photos	SP
A/F 00097	10/9/06	6:56 AM	Kathleen Voelker, Esq. to Joe Price, Tom Connolly, Esq. David Schertler, Esq. re: attorney client communication	JDP
A/F 00098	10/9/06	9:14 AM	David Schertler, Esq. to Joe Price, Kathleen Voelker, Esq., Tom Connolly, Esq. re: attorney client communication	JDP
A/F 00099- 00102	10/9/06	9:17 AM	Emily Thorn to Joe Price cc: Laura Lester, Esq. re: attorney legal research	AWP
A/F 00103- 00104	10/17/06	1:56 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00105	10/25/06	3:56 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F	10/25/06	4:25 PM	Joe Price to David Schertler, Esq. re:	JDP

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Bate's #	Date	Time	Parties	Privilege
00106-00107			attorney client communication	
A/F 00108	10/25/06	4:48 PM	Joe Price to Tom Connolly, Esq. and Kathleen Voelker, Esq. re: attorney client communication	JDP
A/F 00109	10/25/06	4:49 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. re: attorney client communication	JDP
A/F 00110-00112	10/25/06	4:57 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00113-00116	11/8/06	1:34 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward, Michael Starr, Esq. re: attorney client communication	JDP
A/F 00117-00118	12/6/06	10:24 AM	Joe Price to Dylan Ward, Victor Zaborsky, David Schertler, Esq., Kathleen Voelker, Esq. and Tom Connolly, Esq. re: attorney client communication	JDP
A/F 00119-00120	12/6/06	12:34 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00121-00122	12/6/06	10:40 AM	Joe Price to E. Glass re: Washington Post article	JDP
A/F 00123-00125	12/20/06	12:03 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00126-00129	1/8/07	10:36 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Victor Zaborsky, Tom Connolly, Esq. and Dylan Ward re: attorney client communication	JDP
A/F 00130-00134	1/9/07	8:49 AM	Price to David Schertler, Esq., Kathleen Voelker, Esq., Victor Zaborsky, Tom Connolly, Esq. and Dylan Ward re: attorney client communication	JDP
A/F 00135-00143	1/17/07	5:04 PM	Dylan Ward to David Schertler, Esq. and Joe Price re: attorney client communication	JDP
A/F 00144-	1/17/07	5:40 PM	Price to Kathleen Voelker, Esq., David Schertler, Esq., Tom Connolly, Esq. cc:	JDP

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Bate's #	Date	Time	Parties	Privilege
00148			Dylan Ward and Victor Zaborsky re: attorney client communication	
A/F 0014900- 00150	1/25/07	1:14 PM	Joe Price to David Schertler, Esq., Dylan Ward cc: Victor Zaborsky, Kathleen Voelker, Esq., and Tom Connolly, Esq. re: attorney client communication	JDP
A/F 00151- 00153	1/25/07	4:05 PM	Joe Price to Victor Zaborsky, Dylan Ward re: criminal investigation	JDP
A/F 00154- 00156	1/30/07	8:53 AM	Joe Price to David Schertler, Esq., Dylan Ward cc: Victor Zaborsky re: attorney client communication	JDP
A/F 00157- 00160	1/31/07	8:33 AM	Joe Price to David Schertler, Esq., Dylan Ward cc: Victor Zaborsky re: attorney client communication	JDP
A/F 00161- 00163	2/2/07	5:16 PM	Joe Price to Victor Zaborsky and Dylan Ward forwarding attorney/client privilege letter	JDP
A/F 00164- 00166	2/2/07	5:29 PM	Joe Price to Victor Zaborsky and Dylan Ward re: attorney/client privilege information and letter	JDP
A/F 00167- 00170	2/2/07	5:41 PM	Joe Price to Victor Zaborsky re: attorney/client privilege information and letter	JDP SP
A/F 00171- 00173	2/2/07	6:03 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00174- 00176	2/2/07	11:14 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00177- 00178	4/30/07	2:50 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. re: attorney client communication	JDP
A/F 00179- 00180	5/2/07	9:53 AM	Joe Price to Dylan Ward re: newspaper article and investigation	Confidential.
A/F 00181- 00184	5/7/07	8:12 PM	Price David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. re: attorney client communication	JDP
A/F 00185-	5/7/07	8:13 PM	Joe Price to Dylan Ward re: newspaper article and forwarding attorney client	Produced.

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Bate's #	Date	Time	Parties	Privilege
00188			communication	
A/F 00189- 00193	5/7/07	10:39 PM	Joe Price to Tom Connolly, Esq., Kathleen Voelker, Esq. and David Schertler, Esq. re: attorney client communication	JDP
A/F 00194- 00198	5/8/07	10:20 AM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00199- 00203	5/8/07	10:21 AM	Joe Price to Dylan Ward forwarding attorney client correspondence	JDP
A/F 00204- 00208	5/8/07	10:21 AM	Joe Price to Dylan Ward forwarding attorney client correspondence	JDP
A/F 00209- 00213	5/8/07	10:21 AM	Joe Price to Dylan Ward forwarding attorney client correspondence	JDP
A/F 00214- 00218	5/8/07	10:21 AM	Joe Price to Dylan Ward forwarding attorney client correspondence	JDP
A/F 00219- 00223	5/8/07	10:28 AM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00224- 00228	5/8/07	11:54 AM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00229	7/19/07	11:27 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00230- 00232	7/23/07	3:15 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00233- 00234	7/23/07	3:28 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00235- 00238	7/23/07	3:38 PM	Joe Price to Dylan Ward re: television interview	JDP
A/F	7/23/07	3:46 PM	Price to Kathleen Voelker, Esq., Tom	JDP

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Bate's #	Date	Time	Parties	Privilege
00239			Connolly, Esq., Dylan Ward, Victor Zaborsky and David Schertler, Esq. re: attorney client communication	
A/F 00240	7/23/07	3:49 PM	Joe Price to Dylan Ward re: television interview	JDP
A/F 00241	7/24/07	5:33 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Dylan Ward, Zaborsky re: attorney client communication	JDP
A/F 00242	7/24/07	5:42 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq. cc: Victor Zaborsky re: attorney client communication	JDP
A/F 00243	7/24/07	5:43 PM	Dylan Ward to David Schertler, Esq., Kathleen Voelker, Esq., Connolly cc: Victor Zaborsky re: attorney client communication	JDP
A/F 00244	7/24/07	5:51 PM	Joe Price to Dylan Ward, David Schertler, Esq., Kathleen Voelker, Esq. cc: Victor Zaborsky re: attorney client communication	JDP
A/F 00245- 00246	7/25/07	9:39 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Dylan Ward, Tom Connolly, Esq. cc: Victor Zaborsky re: attorney client communication	JDP
A/F 00247	7/25/07	11:34 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00248- 00249	7/25/07	10:32 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP AC
A/F 00250	7/26/07 (2)	12:31 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00251	7/26/07 (2)	12:35 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00252	7/26/07 (4)	12:42 PM	Joe Price to David Schertler, Esq. re: attorney client communication	AC
A/F 00253- 00254	7/26/07	1:52 PM	Joe Price to Dylan Ward, Kathleen Voelker, Esq., David Schertler, Esq., Victor Zaborsky and Tom Connolly, Esq. re:	JDP

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Bate's #	Date	Time	Parties	Privilege
			attorney client communication	
A/F 00255- 00256	7/26/07	1:56 PM	Joe Price to Dylan Ward cc: Victor Zaborsky responding to attorney/client privilege communication	JDP
A/F 00257- 00259	7/26/07	2:40 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Victor Zaborsky and Tom Connolly, Esq. re: attorney client communication	JDP
A/F 00260- 00263	7/26/07	4:26 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Victor Zaborsky and Tom Connolly, Esq. re: attorney client communication	JPD
A/F 00264- 00265	7/26/07 (2)	12:58 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00266- 00267	7/26/07	1:01 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00268- 00271	7/27/07	9:15 AM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00272- 00275	7/29/07	4:48 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00276- 00280	7/30/07	9:49 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00281- 00285	7/30/07	10:09 AM	Joe Price to Tom Connolly, Esq. re: attorney client communication	JDP
A/F 00286- 00287	8/1/07	2:23 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00288- 00290	8/1/07	7:00 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F	8/1/07	7:49 PM	Joe Price to David Schertler, Esq., Kathleen	JDP

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Bate's #	Date	Time	Parties	Privilege
00291-00293			Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	
A/F 00294	8/1/07	10:45 PM	Kathleen Voelker, Esq. to Joe Price to David Schertler, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00295-00296	8/1/07	10:49 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00297-00298	8/2/07	11:38 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00299-00300	8/2/07	1:54 PM	Joe Price to Tom Connolly, Esq. re: attorney client communication	JDP
A/F 00301-00303	8/2/07	2:00 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00304-00306	8/2/07	2:19 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00307-00309	8/2/07	2:24 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00310-00311	8/2/07	3:41 PM	Joe Price to Laura Lester, Esq. re: attorney client communication	AC.
A/F 00310R-00311R	8/2/07	3:41 PM	Joe Price to Laura Lester, Esq. re: attorney client communication	AC. Redacted.
A/F 00312-00315	8/2/07	4:03 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00316-00319	8/2/07	4:16 PM	Tom Connolly, Esq. to Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., cc: Victor Zaborsky, Dylan Ward re: attorney	JDP

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Bate's #	Date	Time	Parties	Privilege
			client communication	
A/F 00320- 00324 (Duplicate 00325- 00329)	8/2/07	4:33 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00330- 00334	8/2/07	4:38 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00335- 00340	8/2/07	4:42 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 000341- 00346	8/2/07	4:59 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00347- 00351	8/2/07	5:24 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00352- 00353	8/3/07	3:13 PM	Joe Price to Laura Lester, Esq. re: attorney client communication	AC.
A/F 00352R- 00353R	8/3/07	3:13 PM	Joe Price to Laura Lester, Esq. re: attorney client communication	AC. Redacted.
A/F 00354- 00355	8/5/07	4:39 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00356- 00357	8/5/07	5:23 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00358- 00360	8/5/07	6:44 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00361-	8/6/07	3:48 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., cc:	JDP

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00362			Victor Zaborsky, Dylan Ward re: attorney client communication	
A/F 00363- 00364	8/6/07	4:02 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00365- 00367	8/6/07	4:16 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00368- 00370	8/6/07	4:17 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00371- 00374	8/6/07	6:26 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00375- 00376	8/7/07	4:01 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00377- 00378	8/7/07	4:05 PM	Tom Connolly, Esq. to Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00379- 00381	8/7/07	4:45 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00382	8/7/07 (2)	4:48 PM	Joe Price to Joe Price re: criminal investigation	AWP
A/F 00383- 00384	8/7/07	4:55 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00385- 00387	8/7/07	7:03 PM	David Schertler, Esq. to Joe Price re: attorney client communication	JDP
A/F 00388- 00390	8/7/07	5:03 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F	8/7/07	5:02 PM	Joe Price to David Schertler, Esq. re:	JDP

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Bate's #	Date	Time	Parties	Privilege
00391-00392			attorney client communication	
A/F 00393	8/8/07	6:37 PM	Joe Price to Emily Thorne, Esq. and Laura Lester, Esq. re: attorney client communication	AWP
A/F 00394-00395	8/8/07	6:43 PM	Emily Thorne, Esq. to Joe Price and Laura Lester, Esq. re: attorney client communication	AWP
A/F 00396-00397	8/8/07	6:53 PM	Joe Price to Emily Thorne, Esq., Esq. and Laura Lester, Esq. re: attorney client communication	AWP
A/F 00398-00399	8/9/07	11:30 AM	Emily Thorne, Esq., Esq. to Price and Laura Lester, Esq. re: attorney client communication	AWP
A/F 00400-00401	8/9/07	2:38 PM	Joe Price to Emily Thorne, Esq. and Laura Lester, Esq. re: attorney client communication	AWP
A/F Duplicate 00400-00401	8/9/07	2:38 PM	Joe Price to Emily Thorne, Esq. and Laura Lester, Esq. re: attorney client communication	AWP
A/F 00402-00403	8/9/07	5:54 PM	Emily Thorne, Esq. to Joe Price and Laura Lester, Esq. re: attorney client communication	AWP
A/F 00404	8/9/07	6:55 PM	Joe Price to David Schertler, Esq. and Kathleen Voelker, Esq. re: attorney client communication	JDP
A/F 00405-00406	8/10/07	6:28 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. re: attorney client communication	JDP
A/F 00407-00409	8/10/07	9:57 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. re: attorney client communication	JDP
A/F 00410-00412	8/10/07	10:00 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00413-00416	8/10/07	10:07 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00417	8/11/07 (2)	9:49 PM	Joe Price to David Schertler, Esq. and Kathleen Voelker, Esq., cc: Joe Price re: attorney client communication	JDP

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A/F 00418- 00419	8/13/07	12:17 PM	Joe Price to Laura Lester, Esq. re: attorney client communication	AC.
A/F 00418R- 00419R	8/13/07	12:17 PM	Joe Price to Laura Lester, Esq. re: attorney client communication	AC. Redacted.
A/F 00420- 00421	8/13/07	10:44 PM	Joe Price to Kathleen Voelker, Esq. re: attorney client communication	AC
A/F 00422	8/19/07	10:57 PM	Joe Price to Dylan Ward re: burglary investigation	JDP
A/F 00423- 00427	8/21/07	4:53 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., Richardson, Danny Onorato, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00428	8/31/07	9:03 AM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00429	8/31/07	9:12 AM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00430	8/31/07	9:23 AM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00431- 00432	8/31/07	9:33 AM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00433- 00434	8/31/07	10:52 AM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00435- 00436	11/28/07	10:48 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00437- 00442	11/29/07	10:06 AM	Joe Price to Victor Zaborsky re: custody issues	SP
A/F 00443- 00445	11/29/07	12:05 PM	Joe Price to Emily Thorne, Esq., Esq. re: attorney client communication	Produced.
A/F 00446- 00447	2/13/08	8:46 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP

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A/F 00448	6/25/08	8:47 AM	Joe Price to Joe Price re: attorney meeting	AWP
A/F 00449- 00450	6/25/08	9:10 AM	Joe Price to David Schertler, Esq., Danny Onorato, Esq. cc: Dylan Ward and Victor Zaborsky re: attorney client communication	JDP
A/F 00451	6/25/08	6:12 PM	Joe Price to David Schertler, Esq., Danny Onorato, Esq. cc: Dylan Ward and Victor Zaborsky re: attorney client communication	JDP
A/F 00452- 00453	6/25/08	9:25 PM	Joe Price to David Schertler, Esq., Danny Onorato, Esq. cc: Dylan Ward and Victor Zaborsky re: attorney client communication	JDP
A/F 00454- 00455	6/26/08	7:13 AM	Joe Price to David Schertler, Esq. cc: Danny Onorato, Esq. re: attorney client communication	JDP
A/F 00456- 00457	6/26/08	7:25 AM	Joe Price to David Schertler, Esq. cc: Danny Onorato, Esq. re: attorney client communication	JDP
A/F 00458- 00460	6/26/08	11:01 AM	Joe Price to David Schertler, Esq. cc: Danny Onorato, Esq. re: attorney client communication	JDP
A/F 00461- 00463	6/26/08	5:26 PM	Joe Price to David Schertler, Esq., Victor Zaborsky, Danny Onorato, Esq. cc: Dylan Ward re: attorney client communication	JDP
A/F 00464- 00466	6/28/08	1:52 PM	Joe Price to David Schertler, Esq., Victor Zaborsky, Danny Onorato, Esq. cc: Dylan Ward re: attorney client communication	JDP
A/F 00467- 00469	6/29/08	8:15 AM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00470- 00473	6/29/08	12:20 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00474	7/6/08	11:28 AM	Joe Price to Dylan Ward cc: Victor Zaborsky re: criminal investigation	Produced.
A/F 00475- 00476	7/6/08	2:09 PM	Joe Price to Dylan Ward re: prosecution's allegations	Produced.
A/F 00477- 00478	7/6/08	2:55 PM	Joe Price to Dylan Ward re: prosecution's allegations	Produced.
A/F 00479-	7/9/08	6:55 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., cc:	JDP

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00481			Victor Zaborsky, Dylan Ward re: attorney client communication	
A/F 00482	7/15/08	8:58 AM	Joe Price to David Schertler, Esq., Danny Onorato, Esq., cc: Kathleen Voelker, Esq., Tom Connolly, Esq., Dylan Ward and Victor Zaborsky re: attorney client communication	JDP
A/F 00483- 00484	7/19/08	10:16 PM	Joe Price to David Schertler, Esq. cc: Dylan Ward, Victor Zaborsky re: attorney client communication	JDP
A/F 00485- 00486	7/20/08	8:44 AM	Joe Price to David Schertler, Esq. cc: Dylan Ward, Victor Zaborsky	JDP
A/F 00487- 00489	7/20/08	1:16 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00490- 00493	7/20/08	1:33 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00494- 00497	7/20/08	1:44 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00498- 00501	7/20/08	3:02 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00502- 00506	7/20/08	3:20 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00507	7/22/08	9:57 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward, Danny Onorato, Esq. and Robert Spagnoletti, Esq. re: attorney client communication	JDP
A/F 00508	7/22/08	10:47 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward, Danny Onorato, Esq. and Robert Spagnoletti, Esq. re: attorney client communication	JDP
A/F 00509- 00512	7/22/08	10:50 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward, Danny Onorato, Esq. and Robert Spagnoletti, Esq.	JDP

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			re: attorney client communication	
A/F 00513- 00515	7/22/08	11:22 AM	Joe Price to Victor Zaborsky re: draft attorney/client privilege communication	JDP SP
A/F 00516- 00518	7/22/08	7:55 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward, Danny Onorato, Esq. and Robert Spagnoletti, Esq. re: attorney client communication	JDP
A/F 00519- 00521	7/22/08	9:10 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward, Danny Onorato, Esq. and Robert Spagnoletti, Esq. re: attorney client communication	JDP
A/F 00522- 00524	7/22/08	10:55 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward, Danny Onorato, Esq. and Robert Spagnoletti, Esq. re: attorney client communication	JDP
A/F 00525	7/23/08	10:32 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward, Danny Onorato, Esq. and Robert Spagnoletti, Esq. re: attorney client communication	JDP
A/F 00526- 00527	7/23/08	12:50 PM	Joe Price to David Schertler, Esq. and Tom Connolly, Esq., cc: Victor Zaborsky, Dylan Ward, Danny Onorato, Esq. and Robert Spagnoletti, Esq. re: attorney client communication	JDP
A/F 00528- 00532	7/23/08	12:57 PM	Joe Price to David Schertler, Esq., Dylan Ward and Victor Zaborsky re: attorney client communication	JDP
A/F 00533- 00534	7/23/08	1:04 PM	Joe Price to Dylan Ward cc: Victor Zaborsky forwarding attorney/client communication and work product	JDP
A/F 00535- 00536	7/23/08	1:32 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward, Danny Onorato, Esq., Michael Starr, Esq. and Robert Spagnoletti, Esq. re: attorney client communication	JDP
A/F 00537-	7/23/08	1:40 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc:	JDP

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00538			Victor Zaborsky, Dylan Ward, Danny Onorato, Esq., Michael Starr, Esq. and Robert Spagnoletti, Esq. re: attorney client communication	
A/F 00539- 00540	7/23/08	3:20 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward, Danny Onorato, Esq., Michael Starr, Esq. and Robert Spagnoletti, Esq. re: attorney client communication	JDP
A/F 00541- 00543	7/23/08	3:28 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward, Danny Onorato, Esq., Michael Starr, Esq. and Robert Spagnoletti, Esq. re: attorney client communication	JDP
A/F 00544- 00547	7/23/08	3:31 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward, Danny Onorato, Esq., Michael Starr, Esq. and Robert Spagnoletti, Esq. re: attorney client communication	JDP
A/F 00548- 00551	7/23/08	3:32 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward, Danny Onorato, Esq., Michael Starr, Esq. and Robert Spagnoletti, Esq. re: attorney client communication	JDP
A/F 00552- 00555	7/23/08	4:08 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward, Danny Onorato, Esq., Michael Starr, Esq. and Robert Spagnoletti, Esq. re: attorney client communication	JDP
A/F 00556- 00559	7/23/08	4:17 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP AC
A/F 00560- 00564	7/23/08	4:35 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP AC
A/F 00565- 00568	7/23/08	4:36 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward, Danny	JDP

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			Onorato, Esq., Michael Starr, Esq. and Robert Spagnoletti, Esq. re: attorney client communication	
A/F 00569- 00570	7/24/08	8:18 AM	Joe Price David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward, Danny Onorato, Esq., Michael Starr, Esq. and Robert Spagnoletti, Esq. re: attorney client communication	JDP
A/F 00571- 00573	7/24/08	1:22 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward, Danny Onorato, Esq., Michael Starr, Esq. and Robert Spagnoletti, Esq. re: attorney client communication	JDP
A/F 00574- 00576	7/24/08	1:27 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward, Danny Onorato, Esq., Michael Starr, Esq. and Robert Spagnoletti, Esq. re: attorney client communication	JDP
A/F 00577- 00578	7/24/08	1:28 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00580- 00582	7/24/08	1:57 PM	Joe Price to Tom Connolly, Esq. re: attorney client communication	JDP
A/F 00583- 00584	7/24/08	5:48 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward, Danny Onorato, Esq. and Robert Spagnoletti, Esq. re: attorney client communication	JDP
A/F 00585	7/27/08	3:19 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., Danny Onorato, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00586- 00587	7/27/08	6:29 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00588	7/27/08	9:24 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00589	7/27/08	9:25 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP

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A/F 00590	7/27/08	9:28 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00591	7/27/08	9:59 PM	Joe Price to Kathleen Voelker, Esq. re: attorney client communication	AC
A/F 00592	7/28/08	5:32 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00593- 00594	7/28/08	9:15 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. re: attorney client communication	JDP
A/F 00595	7/29/08	8:08 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00596- 00597	7/29/08	8:35 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00598- 00599	7/29/08	10:30 AM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00600- 00601	7/29/08	12:07 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00602	7/29/08	3:49 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward, Danny Onorato, Esq., Robert Spagnoletti, Esq. re: attorney client communication	JDP
A/F 00603- 00604	7/29/08	5:21 PM	Joe Price to Dylan Ward re: attorney/client meeting	JDP
A/F 00605- 00606	7/30/08	7:12 PM	Joe Price to Victor Zaborsky re: prosecution's theory	JDP/SP
A/F 00607- 00608	7/30/08	7:09 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward, Danny Onorato, Esq., Robert Spagnoletti, Esq. re: attorney client communication	JDP
A/F	7/31/08	9:56 AM	Joe Price to David Schertler, Esq., Kathleen	JDP

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00609-00610			Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward, Danny Onorato, Esq., Michael Starr, Esq. and Robert Spagnoletti, Esq. re: attorney client communication	
A/F 00611-00613	8/1/08	9:40 AM (2)	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00614-00617	8/1/08	1:23 PM (2)	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00618-00621	8/4/08	10:05 AM (2)	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00622	8/5/08	4:29 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00623-00624	8/5/08	5:27 PM	Joe Price to Dylan Ward re: attorney client communication re: investigation	JDP.
A/F 00623R-00624R	8/5/08	5:27 PM	Joe Price to Dylan Ward re: attorney client communication re: investigation	JDP, Redacted.
A/F 00625-00626	8/6/08	9:27 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00627-00629	8/12/08	10:59 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00630-00633	8/13/08	7:57 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00634-00635	8/18/08	6:52 AM	Joe Price to David Schertler, Esq., Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Robert Spagnoletti, Esq., Tom Connolly, Esq.,	JDP

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Bate's #	Date	Time	Parties	Privilege
			Victor Zaborsky re: attorney client communication	
A/F 00636- 00637	8/20/08	11:06 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00638- 00639	8/20/08	10:44 PM	David Schertler, Esq. to Danny Onorato, Esq., Dylan Ward, Price, Kathleen Voelker, Esq., Michael Starr, Esq., Robert Spagnoletti, Esq., Tom Connolly, Esq., Victor Zaborsky re: attorney client communication	JDP
A/F 00640- 00642	8/20/08	11:15 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00643- 00645 Duplicate 00646- 00648	8/21/08	8:14 AM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00649- 00651	8/21/08	10:43 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00652- 00654	8/29/08	10:04 AM	Tom Connolly, Esq. to Joe Price, Dylan Ward, Victor Zaborsky, Kathleen Voelker, Esq. and David Schertler, Esq. re: attorney client communication	JDP
A/F 00655- 00657	8/29/08	11:14 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00658- 00661	8/29/08	12:37 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00662- 00667	8/29/08	2:33 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00668- 00670	9/15/08	3:27 PM	Joe Price to David Schertler, Esq. cc: Dylan Ward and Victor Zaborsky re: attorney client communication	JDP

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Bate's #	Date	Time	Parties	Privilege
A/F 00671- 00674	9/18/08	3:25 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00675- 00678	9/30/08	11:04 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00679	10/31/08	8:17 AM	Joe Price to Laura Lester, Esq. re: attorney client communication	AWP
A/F 00680 Duplicate 00681	10/31/08	4:43 PM	Joe Price to Kim Hibbert (Joe Price's secretary) forwarding/attaching exhibits to affidavit in support of arrest warrant	AWP
A/F 00682- 00683	11/2/08	8:58 AM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00684- 00685	11/2/08	9:10 AM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00686- 00687	11/2/08	9:23 AM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00688- 00689	11/2/08	9:24 AM	David Schertler, Esq. to Joe Price re: attorney client communication	JDP
A/F 00690- 00692	11/2/08	9:35 AM	David Schertler, Esq. to Joe Price re: attorney client communication	JDP
A/F 00693- 00695	11/2/08	9:50 AM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00696- 00698	11/2/08	11:16 AM	David Schertler, Esq. to Joe Price re: attorney client communication	JPD
A/F 00699- 00700	11/2/08	11:19 AM	Joe Price to David Schertler, Esq., Bernard Grimm, Esq. re: attorney client communication	JDP
A/F 00701- 00703	11/2/08	11:20 AM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00704	11/2/08	11:22 AM	Joe Price to Bernard Grimm, Esq. re: attorney client communication	AC

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Bate's #	Date	Time	Parties	Privilege
A/F 00705- 00708	11/2/08	11:26 AM	Joe Price to David Schertler, Esq. re: attorney client communication	JPD
A/F 00709- 00710	11/2/08	12:39 PM	Bernard Grimm, Esq. to Joe Price re: attorney client communication	AC
A/F 00711- 00712	11/2/08	1:03 PM	Bernard Grimm, Esq. to Joe Price re: attorney client communication	AC
A/F 00713	11/2/08	1:40 PM	Joe Price to David Schertler, Esq. and Bernard Grimm, Esq. re: attorney client communication	JDP
A/F 00714	11/2/08	3:36 PM	David Schertler, Esq. to Joe Price, Bernard Grimm, Esq. re: attorney client communication	JDP
A/F 00715	11/2/08	3:54 PM	Joe Price to David Schertler, Esq., Bernard Grimm, Esq. re: attorney client communication	JDP
A/F 00716- 00717	11/2/08	5:01 PM	Bernard Grimm, Esq. to Joe Price re: attorney client communication	AC
A/F 00718- 00719	11/2/08	5:29 PM	Joe Price to Bernard Grimm, Esq. re: attorney client communication	AC
A/F 00720- 00724	11/5/08	8:30 AM	Joe Price to Bernard Grimm, Esq. re: attorney client communication	AC
A/F 00725- 00727	11/5/08	9:17 AM	Joe Price to Bernard Grimm, Esq. re: attorney client communication	AC
A/F 00728	11/6/08 (2)	8:07 AM	Joe Price to Joe Price forwarding attorney client materials	AWP
A/F 00729	11/6/08	8:23 AM	Joe Price to Joe Price forwarding attorney client materials	AWP
A/F 00730- 00731 Duplicate 00732- 00733	11/6/08 (2)	8:35 AM	Joe Price to Bernard Grimm, Esq., Schoch, Esq. Todryk, Esq. David Schertler, Esq., Danny Onorato, Esq., Tom Connolly, Esq., Richardson, Esq. re: attorney client communication	JDP/ AWP
A/F 00734	11/6/08	8:37 AM	Joe Price to Tom Connolly, Esq., David Schertler, Esq., Danny Onorato, Esq.,	JDP/ AWP

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			Bernard Grimm, Esq., Todryk, Esq., Schoch, Esq., Richardson, Esq. re: attorney client communication	
A/F 00735- 00750	11/6/08	8:46 PM	David Schertler, Esq. to Richardson, Bernard Grimm, Esq., Danny Onorato, Esq., Dylan Ward, Joe Price, Kathleen Voelker, Esq., Michael Starr, Esq., Robert Spagnoletti, Esq., Tom Connolly, Esq., Jennings, Victor Zaborsky re: attorney client communication	JDP

“Wone.pst” Folder:

Bate's #	Date	Time	Parties	Privilege
A/F 00751- 00752	8/12/06	12:53 PM	Kathleen Voelker, Esq. to Joe Price re: attorney client communication	AC
A/F 00753	8/15/06	5:58 PM	David Schertler, Esq. to Kathleen Voelker, Esq., Joe Price, Dylan Ward and Victor Zaborsky re: attorney client communication	JDP
A/F 00754	8/15/06	10:48 PM	Dylan Ward to Joe Price cc: Victor Zaborsky re: attorney meeting with David Schertler	JDP
A/F 00755- 00756	8/16/06 (2)	8:35 AM	Joe Price to Joe Price forwarding attorney work product	AWP
A/F 00757	8/16/06	5:17 PM	Joe Price to Kathleen Voelker, Esq. and David Schertler, Esq. re: attorney client communication	JDP
A/F 00758	8/16/06	6:00 PM	Kathleen Voelker, Esq. to David Schertler, Esq. and Joe Price re: attorney client communication	JDP
A/F 00759- 00760	8/18/06	8:45 AM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Kathleen Voelker, Esq., Richardson, Esq. re: attorney client communication	JDP
A/F 00761- 00762	8/18/06	9:13 AM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00763- 00764	8/18/06	12:01 PM	David Schertler, Esq. to Joe Price, Kathleen Voelker, Esq., Tom Connolly, Esq. and Richardson, Esq. re: attorney client	JDP

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Bate's #	Date	Time	Parties	Privilege
			communication	
A/F 00765- 00766	8/18/06	4:47 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., Richardson, Esq. re: attorney client communication	JDP
A/F 00767	9/8/06	3:16 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. re: attorney client communication	JDP
A/F 00768- 00769	9/8/06	3:21 PM	Joe Price to Tom Connolly, Esq., David Schertler, Esq. and Kathleen Voelker, Esq. re: attorney client communication	JDP
A/F 00770	10/9/06	6:56 AM	Kathleen Voelker, Esq. to Joe Price, David Schertler, Esq., and Tom Connolly, Esq. re: attorney client communication	JDP
A/F 00771	10/9/06	9:14 AM	David Schertler, Esq. to Kathleen Voelker, Esq., Joe Price and Tom Connolly, Esq. re: attorney client communication	JDP
A/F 00772- 00775	10/9/06	9:17 AM	Emily Thorne, Esq. to Joe Price cc: Laura Lester, Esq. re: attorney client communication	AWP
A/F 00776- 00777	10/17/06	1:56 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 00778- 00779	10/25/06	3:30 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. re: attorney client communication	JDP
A/F 00780	10/25/06	4:48 PM	Joe Price to Tom Connolly, Esq., Kathleen Voelker, Esq. re: attorney client communication	JDP
A/F 00781- 00783	10/25/06	4:57 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00784- 00785	12/6/06	10:24 AM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 00786- 00787	12/6/06	10:40 AM	Joe Price to E. Glass forwarding news article re: criminal investigation	JDP
A/F 00788-	12/6/06	10:41 AM	Joe Price to E. Glass forwarding attorney client communication	JDP

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Bate's #	Date	Time	Parties	Privilege
00789				
A/F 00790- 00791	12/6/06	12:34 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 00797- 00805	1/17/07	5:04 PM	Dylan Ward to David Schertler, Esq. and Joe Price re: attorney client communication	JDP
A/F 00792- 00796	1/17/07	5:40 PM	Joe Price to Kathleen Voelker, Esq., David Schertler, Esq., Tom Connolly, Esq. cc: Dylan Ward and Victor Zaborsky re: attorney client communication	JDP
A/F 00806- 00808	2/2/07	5:16 PM	Joe Price to Victor Zaborsky and Dylan Ward forwarding attorney client communication and work product	JDP/AWP
A/F 00809- 00811	2/2/07	5:29 PM	Joe Price to Dylan Ward and Victor Zaborsky forwarding attorney client communication and work product	JDP
A/F 00812- 00815	2/2/07	5:41 PM	Joe Price to Victor Zaborsky forwarding attorney client communication and work product	JDP/SP
A/F 00816- 00818	2/2/07	6:03 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 00819- 00821	2/2/07	11:14 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00822- 00823	4/30/07	2:50 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. re: attorney client communication	JDP
A/F 00824- 00827	5/7/07	8:12 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. re: attorney client communication	JDP
A/F 00828- 00831	5/7/07	8:13 PM	Joe Price to Dylan Ward responding to attorney client correspondence	Produced.
A/F 00832- 00836	5/7/07	10:39 PM	Joe Price to Tom Connolly, Esq., Kathleen Voelker, Esq. and David Schertler, Esq. re: attorney client communication	JDP
A/F 00837-	5/8/07	10:20 AM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP

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00841				
A/F 00842- 00846	5/8/07 (2)	10:21 AM	Joe Price to Dylan Ward forwarding attorney client communication	JDP
A/F 00847- 00851	5/8/07	10:21 AM	Joe Price to Dylan Ward forwarding attorney client communication	JDP
A/F 00852- 00856	5/8/07	10:21 AM	Joe Price to Dylan Ward forwarding attorney client communication	JDP
A/F 00857- 00861	5/8/07	10:28 AM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00862- 00866	5/8/07	11:54 AM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00867- 00868	7/20/07	5:19 PM	Joe Price to David Schertler, Esq., Dylan Ward cc: Victor Zaborsky, Kathleen Voelker, Esq. and Tom Connolly, Esq. re: attorney client communication	JDP
A/F 00869	7/24/07	5:33 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 00870	7/24/07	5:42 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 00871	7/24/07	5:43 PM	Dylan Ward to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Joe Price re: attorney client communication	JDP
A/F 00872	7/24/07	5:51 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 00873	7/26/07 (2)	12:31 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 00874	7/26/07 (2)	12:35 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward re:	JDP

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Bate's #	Date	Time	Parties	Privilege
			attorney client communication	
A/F 00875	7/26/07 (2)	12:42 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00876- 00877	7/26/07 (2)	12:58 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 00878- 00879	7/26/07	1:01 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 00880- 00881	7/26/07	1:52 PM	Joe Price to Dylan Ward, Kathleen Voelker, Esq., David Schertler, Esq., Victor Zaborsky and Tom Connolly, Esq. re: attorney client communication	JDP
A/F 00882- 00883	7/26/07	1:56 PM	Joe Price to Dylan Ward cc: Victor Zaborsky re: attorney client communication re: press conference	JDP.
A/F 00882R- 00883R	7/26/07	1:56 PM	Joe Price to Dylan Ward cc: Victor Zaborsky re: attorney client communication re: press conference	JDP. Redacted.
A/F 00884- 00887	7/27/07	9:15 AM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00888- 00891	7/29/07	4:48 PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Dylan Ward, Kathleen Voelker, Esq. and Victor Zaborsky re: attorney client communication	JDP
A/F 00892- 00896	7/30/07	9:49 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00897- 00901	7/30/07	10:09 AM	Joe Price to Tom Connolly, Esq. re: attorney client communication	JDP
A/F 00902	8/1/07	1:22 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. re: attorney client communication	JDP
A/F 00903- 00904	8/1/07	2:23 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward re: attorney client communication	JDP

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A/F 00905- 00907	8/1/07	7:00 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 00908- 00910	8/1/07	7:48 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 00911- 00913	8/2/07	2:00 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 00914- 00916	8/2/07	2:19 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 00917- 00919	8/2/07	2:24 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 00920- 00923	8/2/07	4:03 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 00924- 00927	8/2/07	4:16 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 00928- 00932	8/2/07	4:33 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00933- 00937	8/2/07	4:38 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00938- 00943	8/2/07	4:42 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00944- 00494	8/2/07	4:59 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney	JDP

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			client communication	
A/F 00950- 00954	8/2/07	5:24 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky, Dylan Ward re: attorney client communication	JDP
A/F 00955- 00956	8/3/07	3:12 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 00957- 00958	8/5/07	5:23 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 00959	8/6/07	3:19 PM	Joe Price to Kathleen Voelker, Esq., Victor Zaborsky, Dylan Ward, David Schertler, Esq., Tom Connolly, Esq. re: attorney client communication	JDP
A/F 00960- 00961	8/6/07	3:48 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 00962- 00963	8/6/07	4:02 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 00964- 00966	8/6/07	4:16 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00967- 00969	8/6/07	4:17 PM	Joe Price to Tom Connolly, Esq. re: attorney client communication	JDP
A/F 00970- 00973	8/6/07	6:26 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00974- 00976	8/7/07	4:45 PM	Joe Price to Kathleen Voelker, Esq., David Schertler, Esq., Tom Connolly, Esq., Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 00977	8/9/07	6:55 PM	Joe Price to David Schertler, Esq. and Kathleen Voelker, Esq. re: attorney client communication	JDP
A/F 00978-	8/10/07	6:28 PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Kathleen Voelker, Esq. re:	JDP

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00979			attorney client communication	
A/F 00980- 00983	8/10/07	10:07 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00984- 00986	8/10/07	9:57 PM	David Schertler, Esq. to Joe Price, Tom Connolly, Esq. and Kathleen Voelker, Esq. re: attorney client communication	JDP
A/F 00987- 00989	8/10/07	10:00 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 00990	8/11/07	3:30 PM	Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 00991	8/11/07 (2)	9:49 PM	Joe Price to David Schertler, Esq. and Kathleen Voelker, Esq., cc: Joe Price re: attorney client communication	JDP
A/F 00992- 00993	8/12/07	8:59 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 00994- 00995	8/13/07	10:44 PM	Joe Price to Kathleen Voelker, Esq. re: attorney client communication	AC
A/F Missing	11/28/07	10:48 AM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward, Laura Lester, Esq. re: attorney client communication	JDP
A/F 00996- 01001	11/29/07	10:06 AM	Joe Price to Victor Zaborsky re: family matters	SP
A/F 01002- 01004	11/29/07	12:05 PM	Joe Price to Emily Thorne, Esq. re: attorney client communication	Produced.
A/F 01005- 01008	7/22/08	10:50 AM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward, Robert Spagnoletti, Esq., Danny Onorato, Esq. re: attorney client communication	JDP
A/F 01009-	7/23/08	12:57 PM	Joe Price to David Schertler, Esq., cc: Victor Zaborsky and Dylan Ward re: attorney client	JDP

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Bate's #	Date	Time	Parties	Privilege
01013			communication	
A/F 01014- 01019	7/23/08	1:04 PM	Joe Price to Victor Zaborsky forwarding attorney client communication	JDP SP
A/F 01020- 01021	7/23/08	1:40 PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq. and Kathleen Voelker, Esq. cc: Dylan Ward, Victor Zaborsky, Robert Spagnoletti, Esq., Danny Onorato, Esq. and Michael Starr, Esq. re: attorney client communication	JDP
A/F Missing	7/23/08	7:44 PM	Joe Price to Victor Zaborsky, Dylan Ward, Danny Onorato, Esq., David Schertler, Esq., Kathleen Voelker, Esq. and Tom Connolly, Esq. re: attorney client communication	JDP
A/F 01023	7/23/08 (2)	10:41 PM	Joe Price to Kathleen Voelker, Esq. re: attorney client communication	AC
A/F 01024- 01026	7/24/08	1:22 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward, Danny Onorato, Esq., Spagnoletti, Michael Starr, Esq. re: attorney client communication	JDP
A/F 01027- 01029	7/24/08	1:28 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 01030- 01032	7/24/08	1:57 PM	Joe Price to Tom Connolly, Esq. re: attorney client communication	JDP
A/F 01033	7/24/08	3:03 PM	Joe Price to Victor Zaborsky, Tom Connolly, Esq., cc: Dylan Ward, David Schertler, Esq., Kathleen Voelker, Esq. re: attorney client communication	JDP
A/F 01034- 01035	7/24/08	5:48 PM	Joe Price to Victor Zaborsky Tom Connolly, Esq., David Schertler, Esq. cc: Kathleen Voelker, Esq., Danny Onorato, Esq., Robert Spagnoletti, Esq. and Dylan Ward re: attorney client communication	JDP
A/F 01036	7/27/08 (2)	3:19 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq., Danny Onorato, Esq. cc: Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F	7/27/08	6:29 PM	Joe Price to David Schertler, Esq. re:	JDP

**PRIVILEGE LOG – ARENT FOX DISC 5
(AMENDED FOR PRODUCTION ON 7/15/10)
(From Files Entitled “Rob, Robert, and Wone”)
Civil Action No. 0008315-08**

Bate's #	Date	Time	Parties	Privilege
01037-01038	(2)		attorney client communication	
A/F 01039	7/27/08	9:24 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 01040	7/27/08 (2)	9:25 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 01041	7/27/08	9:59 PM	Joe Price to Kathleen Voelker, Esq. re: attorney client communication	AC
A/F 01042-01043	7/28/08	9:15 AM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. re: attorney client communication	JDP
A/F 01044-01046	8/1/08 (2)	9:40 AM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 01047-01050	8/1/08 (2)	1:23 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 01051-01054	8/4/08 (2)	10:05 AM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 01055	8/4/08	11:47 AM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Kathleen Voelker, Esq., Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 01056-01057	8/4/08 (2)	5:36 PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Kathleen Voelker, Esq., Dylan Ward and Victor Zaborsky re: attorney client communication	JDP
A/F 01058-01059	8/5/08	10:49 PM	Joe Price to Victor Zaborsky re: personal issues	SP
A/F 01060-01061	8/18/08	6:52 AM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq., Robert Spagnoletti, Esq., Danny Onorato, Esq. cc: Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 01062-01063	8/20/08	10:44 PM	David Schertler, Esq. to Danny Onorato, Esq., Dylan Ward, Price, Kathleen Voelker, Esq., Michael Starr, Esq., Robert	JDP

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Bate's #	Date	Time	Parties	Privilege
			Spagnoletti, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney client communication	
A/F 01064- 01065	8/20/08	11:06 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 01066- 01068	8/20/08	11:15 PM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 01069- 01071	8/21/08	8:14 AM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 01072- 01074	8/21/08	10:43 AM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 01075	8/27/08	10:06 AM	Joe Price to David Schertler, Esq., cc: Kathleen Voelker, Esq., Tom Connolly, Esq., Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 01076- 01077	8/27/08	10:16 AM	Joe Price to Tom Connolly, Esq., David Schertler, Esq. cc: Kathleen Voelker, Esq., Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 01078- 01080	8/29/08	10:04 AM	Tom Connolly, Esq. to Kathleen Voelker, Esq., Joe Price, David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 01081- 01084	8/29/08	12:37 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 01085- 01090	8/29/08	2:33 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., David Schertler, Esq. cc: Victor Zaborsky and Dylan Ward re: attorney client communication	JDP
A/F 01091	10/31/08	8:17 AM	Joe Price to Laura Lester, Esq. re: attorney client communication	AC
A/F 01092- 01093	11/2/08	8:58 AM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 01094-	11/2/08	9:10 AM	David Schertler, Esq. to Joe Price re: attorney client communication	JDP

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Bate's #	Date	Time	Parties	Privilege
01095				
A/F 01096- 01097	11/2/08	9:23 AM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 01098- 01099	11/2/08	9:24 AM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 01100- 01102	11/2/08	9:34 AM	David Schertler, Esq. to Joe Price re: attorney client communication	JDP
A/F 01103- 01105	11/2/08	9:50 AM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 01106- 01108	11/2/08	11:16 AM	David Schertler, Esq. to Joe Price re: attorney client communication	JDP
A/F 01109- 01110	11/2/08	11:19 AM	Joe Price to David Schertler, Esq. and Bernard Grimm, Esq. re: attorney client communication	JDP
A/F 01111- 01113	11/2/08	11:20 AM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 01114	11/2/08	11:22 AM	Joe Price to Bernard Grimm, Esq. re: attorney client communication	AC
A/F 01115- 01118	11/2/08	11:26 AM	Joe Price to David Schertler, Esq. re: attorney client communication	JDP
A/F 01119- 01120	11/2/08	12:39 PM	Bernard Grimm, Esq. to Joe Price re: attorney client communication	AC
A/F 01121- 01122	11/2/08	1:03 PM	Bernard Grimm, Esq. to Joe Price re: attorney client communication	AC
A/F 01123	11/2/08 (2)	1:40 PM	Joe Price to Bernard Grimm, Esq. and David Schertler, Esq. re: attorney client communication	JDP
A/F 01124	11/2/08	3:36 PM	David Schertler, Esq. to Joe Price and Bernard Grimm, Esq. re: attorney client communication	JDP
A/F 01125	11/2/08	3:54 PM	Joe Price to David Schertler, Esq. and Bernard Grimm, Esq. re: attorney client	JDP

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Bate's #	Date	Time	Parties	Privilege
			communication	
A/F 01126- 01127	11/2/08	5:01 PM	Bernard Grimm, Esq. to Joe Price re: attorney client communication	AC
A/F 01128- 01129	11/2/08	5:29 PM	Joe Price to Bernard Grimm, Esq. re: attorney client communication	AC
A/F 01130	11/6/08	8:07 AM	Joe Price to Joe Price forwarding attorney client work product/communication	AWP
A/F 01131	11/6/08 (2)	8:23 AM	Joe Price to Joe Price forwarding attorney client work product / communication	AWP
A/F 01132- 01133	11/06/08	8:35 AM	Joe Price to Tom Connolly, Esq., David Schertler, Esq., Danny Onorato, Esq., Bernard Grimm, Esq., Todryk, Esq., Schoch, Esq., Richardson, Esq. re: attorney client communication	JDP
A/F 01134	11/6/08 (2)	8:37 AM	Joe Price to Tom Connolly, Esq., David Schertler, Esq., Danny Onorato, Esq., Bernard Grimm, Esq., Todryk, Esq. Schoch, Esq., Richardson, Esq. re: attorney client communication	JDP

4819-8379-1111, v. 1

Exhibit 12

**PRIVILEGE LOG – ARENT FOX DISCS 6 & 7
(AMENDED FOR PRODUCTION ON 7/15/10)
(From Files Entitled “Dylan Dylan Ward,” DylanDylan Ward” and “SavorMessage01”)
Civil Action No. 0008315-08**

**Key: JDP – Joint Defense Privilege
AC – Attorney Client Privilege
SP – Spousal Privilege
AWP – Attorney Work Product
NR – Non-Responsive
AFAC – Arent Fox Attorney Client Privilege**

“DylanDylan Ward.pst” Folder:

Bates #	Date	Time	Parties/Description	Privilege
1135-36	8/10/06	11:13 AM	Joe Price to Dylan Ward re: news publications and Victor Zaborsky	Produced.
1137-39	8/10/06	11:28 AM	Joe Price to Dylan Ward re: news publications and Victor Zaborsky upset about same	Confidential.
1140-43	8/10/06	11:45 AM	Joe Price to Dylan Ward re: condition of house due to investigation	Confidential.
1144-47	8/10/06	12:01 PM	Joe Price to Dylan Ward re: condition of house due to investigation	Confidential.
1148-49	8/10/06	12:34 PM	Joe Price to Dylan Ward re: Victor Zaborsky request for counseling	Confidential.
1186-87	8/13/06	10:43 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Dylan Ward, Victor Zaborsky re: the investigation and scheduling a meeting	AC/JDP
1190-91	8/13/06	10:43 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Dylan Ward, Victor Zaborsky re: the investigation and scheduling a meeting	AC/JDP
1188-89	8/16/06	8:35 AM	Joe Price to Joe Price attaching revised draft of news release prepared by David Schertler, Esq.	AC/JDP
Duplicate of 1188-89	8/16/06	8:35 AM	Joe Price to Joe Price attaching revised draft of news release prepared by David Schertler, Esq.	AC/JDP
Duplicate of 1188-89	8/16/06	8:35 AM	Joe Price to Joe Price attaching revised draft of news release prepared by David Schertler, Esq.	AC/JDP
Duplicate of 1188-89	8/16/06	8:35 AM	Joe Price to Joe Price attaching revised draft of news release prepared by David Schertler, Esq.	AC/JDP
1192	10/5/06	4:38 PM	Joe Price to Dylan Ward re: meeting with Kathleen Voelker, Esq.	Produced.
1150	10/25/06 (2)	4:14 PM	Joe Price to Dylan Ward re: “hate-mail” from Sharon Kass	Confidential.
1151	10/25/06	4:28 PM	Joe Price to Dylan Ward re: “hate-mail” from	Confidential.

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	(2)		Sharon Kass	
1152	10/25/06 (2)	4:53 PM	Joe Price to Dylan Ward re: “hate-mail” from Sharon Kass	Confidential.
1193	11/2/06	4:13PM	Joe Price to Dylan Ward re: meeting with their attorneys	JDP
1195-97	11/7/06	11:55 AM	Joe Price to David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq.; cc: Tom Connolly, Esq., Victor Zaborsky re: investigation	JDP
1198-1200	11/7/06	12:09 PM	Joe Price to Tom Connolly, Esq. re: investigation	JDP
1201-02	11/7/06	1:19 PM	Joe Price to David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq.; cc: Tom Connolly, Esq., Victor Zaborsky re: investigation	JDP
1203-05	11/7/06	1:40 PM	Joe Price to Dylan Ward, David Schertler, Esq., Kathleen Voelker, Esq.; cc: Tom Connolly, Esq., Victor Zaborsky re: investigation	JDP
1206-08	11/7/06	1:41 PM	Joe Price to Dylan Ward re: investigation and forwarding attorney client communication	JDP
1209-11	11/7/06	5:34 PM	Joe Price to David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq.; cc: Tom Connolly, Esq., Victor Zaborsky, Michael Starr, Esq. re: investigation	JDP
1212-15	11/7/06	5:44 PM	Joe Price to David Schertler, Esq. re: investigation	JDP
1216-19	11/7/06	5:48 PM	Joe Price to David Schertler, Esq. re: investigation	JDP
1220-23	11/8/06	1:34 PM	Joe Price to David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq.; cc: Tom Connolly, Esq., Victor Zaborsky, Michael Starr, Esq. re: investigation	JDP
Duplicate of 1220-23	11/8/06	1:34 PM	Joe Price to David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq.; cc: Tom Connolly, Esq., Victor Zaborsky, Michael Starr, Esq. re: investigation	JDP
1224-26	11/21/06	12:25 PM	Joe Price to Dylan Ward, David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq.; cc: Victor Zaborsky re: attorney/client communications	JDP
1227-29	11/21/06	11:08 PM	David Schertler, Esq. to Joe Price re: attorney/client communications	JDP

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1230-31	12/6/06	10:24 AM	Joe Price to Dylan Ward, Victor Zaborsky, Kathleen Voelker, Esq., Tom Connolly, Esq. re: news report	JDP
Duplicate of 1230-31	12/6/06	10:24 AM	Joe Price to Dylan Ward, Victor Zaborsky, Kathleen Voelker, Esq., Tom Connolly, Esq. re: news report	JDP
1232-33	12/6/06	12:34 PM	Joe Price to David Schertler, Esq., Dylan Ward, Victor Zaborsky, Kathleen Voelker, Esq., Tom Connolly, Esq. re: investigation	JDP
Duplicate of 1232-33	12/6/06	12:34 PM	Joe Price to David Schertler, Esq., Dylan Ward, Victor Zaborsky, Kathleen Voelker, Esq., Tom Connolly, Esq. re: investigation	JDP
1234-35	12/7/06	11:12 AM	Dylan Ward to David Schertler, Esq., Kathleen Voelker, Esq., Joe Price re: investigation	JDP
1236-37	1/9/07	3:06 PM	Joe Price to Dylan Ward re: attorney/client meeting	JDP
1238-39	1/16/07	9:50 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., Victor Zaborsky, Dylan Ward re: attorney/client meeting	JDP
	1/17/07	5:11 PM	Dylan Ward to Joe Price and David Schertler, Esq. re: news publication related to investigation	JDP
	1/17/07	5:11 PM	Dylan Ward to Joe Price and David Schertler, Esq. re: news publication related to investigation	JDP
1240-44	1/17/07	5:40 PM	Joe Price to Kathleen Voelker, Esq., David Schertler, Esq., Tom Connolly, Esq.; cc: Dylan Ward, Victor Zaborsky re: news publication related to investigation	JDP
Duplicate of 1240-44	1/17/07	5:40 PM	Joe Price to Kathleen Voelker, Esq., David Schertler, Esq., Tom Connolly, Esq.; cc: Dylan Ward, Victor Zaborsky re: news publication related to investigation	JDP
1254	1/18/07	5:25 PM	Joe Price to David Schertler, Esq., Dylan Ward re: investigation and grand jury for burglary case	JDP
1255-56	1/18/07	10:39 PM	Joe Price to David Schertler, Esq. re: investigation and grand jury for burglary case	JDP
1257-59	1/18/07	11:14 PM	Joe Price to David Schertler, Esq. re: investigation and grand jury for burglary case	JDP
1260-62	1/18/07	11:14 PM	Joe Price to David Schertler, Esq. re:	JDP

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			investigation and grand jury for burglary case	
1263-65	1/20/07	12:19 AM	Joe Price to David Schertler, Esq. re: investigation and grand jury for burglary case	JDP
1269-70	1/25/07	1:14 PM	Joe Price to David Schertler, Esq., Dylan Ward; cc: Victor Zaborsky, Kathleen Voelker, Esq., Tom Connolly, Esq. re: attorney/client communication	JDP
Duplicate of 1269-70	1/25/07	1:14 PM	Joe Price to David Schertler, Esq., Dylan Ward; cc: Victor Zaborsky, Kathleen Voelker, Esq., Tom Connolly, Esq. re: attorney/client communication	JDP
1266-68	1/25/07	4:05 PM	Joe Price to Victor Zaborsky and Dylan Ward re: investigation and forwarding/replying to attorney client communication	JDP
Duplicate of 1266-68	1/25/07	4:05 PM	Joe Price to Victor Zaborsky and Dylan Ward re: investigation and forwarding/replying to attorney client communication	JDP
1277-79	1/30/07	8:53 AM	Joe Price to David Schertler, Esq., Dylan Ward; cc: Victor Zaborsky re: attorney/client communication	JDP
Duplicate of 1277-79	1/30/07	8:53 AM	Joe Price to David Schertler, Esq., Dylan Ward; cc: Victor Zaborsky re: attorney/client communication	JDP
1280-83	1/31/07	8:33 AM	Joe Price to David Schertler, Esq., Dylan Ward and Victor Zaborsky re: attorney/client communication	JDP
Duplicate of 1280-83	1/31/07	8:33 AM	Joe Price to David Schertler, Esq., Dylan Ward and Victor Zaborsky re: attorney/client communication	JDP
1284-86	2/2/07	5:29 PM	Joe Price to Dylan Ward and Victor Zaborsky forwarding Dylan Ward attorney/client communication	JDP
Duplicate of 1284-86	2/2/07	5:29 PM	Joe Price to Dylan Ward and Victor Zaborsky forwarding Dylan Ward attorney/client communication	JDP
1271-74	2/2/07	5:41 PM	Joe Price to Victor Zaborsky re: review of attorney communication/work product	SP / JDP
Duplicate of 1271-74	2/2/07	5:41 PM	Joe Price to Victor Zaborsky re: review of attorney communications/work product	SP / JDP
1153	2/8/07	9:41 AM	Joe Price to Dylan Ward re: passport confiscation and providing legal advise re: same	Produced.
1154-55	2/8/07	9:47 AM	Joe Price to Dylan Ward re: passport	Confidential.

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			confiscation and providing legal advise re: same	
1156-57	2/8/07	9:55 AM	Joe Price to Dylan Ward re: passport confiscation and providing legal advise re: same	Confidential.
1158-60	2/8/07	10:21 AM	Joe Price to Dylan Ward re: passport confiscation and providing legal advise re: same	Confidential.
1161-64	2/8/07	10:26 AM	Joe Price to Dylan Ward re: passport confiscation and providing legal advise re: same	Confidential.
1275-76	2/8/07	10:39 AM	Joe Price to David Schertler, Esq. and Dylan Ward re: confiscated items	JDP
1287-88	2/8/07	11:46 AM	Joe Price to David Schertler, Esq. and Dylan Ward re: confiscated items	JDP
1289	2/20/07	5:32 PM	Joe Price to Dylan Ward re: status of confiscated items per conversation with David Schertler, Esq.	JDP
1290-91	2/20/07	5:37 PM	Joe Price to Dylan Ward re: status of confiscated items per conversation with David Schertler, Esq.	JDP.
1290R-91R	2/20/07	5:37 PM	Joe Price to Dylan Ward re: status of confiscated items per conversation with David Schertler, Esq.	JDP. Redacted. Confidential.
1295	2/21/07	8:48 AM	Joe Price to Dylan Ward re: call to Trevor re: picking up items stored after police investigation	Produced.
1296-97	2/21/07	1:48 PM	Joe Price to Dylan Ward and Victor Zaborsky re: clean up of mess made from investigation	Confidential.
1298-99	2/21/07	2:11 PM	Joe Price to Victor Zaborsky re: clean up of mess made from investigation	Confidential.
1300-01	2/21/07	2:11 PM	Joe Price to Dylan Ward re: clean up of mess made from investigation	Confidential.
1292	2/21/07	5:57 PM	Joe Price to David Schertler, Esq., Dylan Ward; cc: Victor Zaborsky, Tom Connolly, Esq., Kathleen Voelker, Esq. re: attorney/client communication	JDP
1293-94	2/21/07	6:02 PM	Joe Price to David Schertler, Esq., Dylan Ward; cc: Victor Zaborsky, Tom Connolly, Esq., Kathleen Voelker, Esq. re: attorney/client communication	JDP
1302-03	2/21/07	7:50 PM	Joe Price to David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq., Tom Connolly,	JDP

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			Esq., Victor Zaborsky re: attorney/client communication	
1304	2/21/07	7:50 PM	Joe Price to Dylan Ward, Victor Zaborsky re: investigation and attorney meeting	JDP.
1304R	2/21/07	7:50 PM	Joe Price to Dylan Ward, Victor Zaborsky re: investigation and attorney meeting	JDP. Redacted.
1305	2/21/07	7:50 PM	Joe Price to Victor Zaborsky, Dylan Ward re: investigation and attorney client communication	JDP.
1305	2/21/07	7:50 PM	Joe Price to Victor Zaborsky, Dylan Ward re: investigation and attorney client communication	JDP. Redacted.
1306-07	2/22/07	8:30 AM	Joe Price to David Schertler, Esq., Victor Zaborsky, Dylan Ward re: attorney/client communication	JDP
1308	2/22/07	10:32 PM	Joe Price to David Schertler, Esq., Dylan Ward, Victor Zaborsky re: attorney/client communication	JDP
1309	2/26/07	2:51 PM	Joe Price to David Schertler, Esq. and Dylan Ward re: attorney/client communications	JDP
1314	3/26/07	12:34 PM	Joe Price to Dylan Ward, David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., Victor Zaborsky forwarding Dylan Ward attorney/client communication	JDP
	3/26/07	12:48 PM	Joe Price to Victor Zaborsky, Dylan Ward re: investigation and replying and responding to attorney client communication	JDP
	3/26/07	12:50 PM	Joe Price to Dylan Ward, Victor Zaborsky re: investigation and replying and responding to attorney client communication	JDP
1310	3/26/07	2:13 PM	Joe Price to Dylan Ward; cc: Victor Zaborsky re: internet blog re: investigation	Produced.
1317-18	3/26/07	6:04 PM	David Schertler, Esq. to Joe Price, Dylan Ward, Kathleen Voelker, Esq., Victor Zaborsky re: attorney/client communication	JDP
1311-13	3/26/07	6:11 PM	Joe Price to Dylan Ward, David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., Victor Zaborsky re: attorney/client communication	JDP
1319-20	3/27/07	10:19 AM	Joe Price to David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq., Tom Connolly, Esq., Victor Zaborsky re: attorney/client communication	JDP

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1321-24	5/16/07	11:20 AM	Joe Price to Dylan Ward forwarding and responding to attorney/client communications	JDP
1325-29	5/16/07	11:46 AM	Joe Price to Dylan Ward; cc: Victor Zaborsky forwarding Dylan Ward attorney/client communication	JDP
1330-32	7/20/07	10:52 AM	Joe Price to Dylan Ward, Tom Connolly, Esq., David Schertler, Esq., Kathleen Voelker, Esq.; cc: Victor Zaborsky re: attorney/client communication	JDP
1333-34	7/20/07	5:19 PM	Joe Price to David Schertler, Esq., Dylan Ward; cc: Victor Zaborsky, Kathleen Voelker, Esq., Tom Connolly, Esq. re: attorney/client communication	JDP
1335-37	7/23/07	3:15 PM	Joe Price to Kathleen Voelker, Esq., David Schertler, Esq., Tom Connolly, Esq.: cc: Dylan Ward, Victor Zaborsky re: attorney/client communication and work product	JDP
Duplicate of 1335-37	7/23/07	3:15 PM	Joe Price to Kathleen Voelker, Esq., David Schertler, Esq., Tom Connolly, Esq.: cc: Dylan Ward, Victor Zaborsky re: attorney/client communication and work product	JDP
1338	7/23/07	3:21 PM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communication and work product	JDP
1339-43	7/23/07	3:28 PM	Joe Price to Kathleen Voelker, Esq., David Schertler, Esq., Tom Connolly, Esq.: cc: Dylan Ward, Victor Zaborsky re: attorney/client communication and work product	JDP
Duplicate of 1339-43	7/23/07	3:28 PM	Joe Price to Kathleen Voelker, Esq., David Schertler, Esq., Tom Connolly, Esq.: cc: Dylan Ward, Victor Zaborsky re: attorney/client communication and work product	JDP
1345-46	7/23/07	3:28 PM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communication and work product	JDP
1347-48	7/23/07	3:31 PM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communication and work product	JDP
1349	7/23/07	3:38 PM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communication and work	JDP

PRIVILEGE LOG – ARENT FOX DISCS 6 & 7
(AMENDED FOR PRODUCTION ON 7/15/10)
(From Files Entitled “Dylan Dylan Ward,” DylanDylan Ward” and “SavorMassage01”)
Civil Action No. 0008315-08

			product	
	7/23/07	3:38 PM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communications	JDP
1344	7/23/07	3:46 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., Dylan Ward, Victor Zaborsky, David Schertler, Esq. re: attorney/client communication	JDP
1351-54	7/23/07	3:46 PM	Joe Price to Kathleen Voelker, Esq., Tom Connolly, Esq., Dylan Ward, Victor Zaborsky, David Schertler, Esq. re: attorney/client communication	JDP
1350	7/23/07	3:49 PM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communication	JDP
Duplicate of 1350	7/23/07	3:49 PM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communication	JDP
1355	7/24/07	5:42 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq.; cc: Dylan Ward, Victor Zaborsky re: attorney/client communication	JDP
Duplicate of 1355	7/24/07	5:42 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq.; cc: Dylan Ward, Victor Zaborsky re: attorney/client communication	JDP
1356	7/24/07	5:51 PM	Joe Price to Dylan Ward, David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq.; cc: Dylan Ward, Victor Zaborsky re: attorney/client communication	JDP
	7/24/07	5:51 PM	Joe Price to Dylan Ward, David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq.; cc: Victor Zaborsky re: attorney/client communication	JDP
1357-58	7/26/07	11:45 AM	Joe Price to Dylan Ward, David Schertler, Esq., Kathleen Voelker, Esq., Victor Zaborsky re: attorney/client communication	JDP
1359-61	7/26/07	12:04 PM	Joe Price to David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq., Victor Zaborsky re: attorney/client communication	JDP
1362-63	7/26/07	12:58 PM	Joe Price to Dylan Ward, Kathleen Voelker, Esq., David Schertler, Esq., Victor Zaborsky, Tom Connolly, Esq. re: attorney/client communication	JDP
Duplicate of 1362-63	7/26/07	12:58 PM	Joe Price to Dylan Ward, Kathleen Voelker, Esq., David Schertler, Esq., Victor Zaborsky, Tom Connolly, Esq. re: attorney/client	JDP

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			communication	
Duplicate of 1362-63	7/26/07	12:58 PM	Joe Price to Dylan Ward, Kathleen Voelker, Esq., David Schertler, Esq., Victor Zaborsky, Tom Connolly, Esq. re: attorney/client communication	JDP
1364-65	7/26/07	1:52 PM	Joe Price to Dylan Ward, Kathleen Voelker, Esq., David Schertler, Esq., Victor Zaborsky, Tom Connolly, Esq. re: attorney/client communication	JDP
Duplicate of 1364-65	7/26/07	1:52 PM	Joe Price to Dylan Ward, Kathleen Voelker, Esq., David Schertler, Esq., Victor Zaborsky, Tom Connolly, Esq. re: attorney/client communication	JDP
1366-68	7/26/07	2:40 PM	Joe Price to David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq., Victor Zaborsky, Tom Connolly, Esq. re: attorney/client communication	JDP
Duplicate of 1366-68	7/26/07	2:40 PM	Joe Price to David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq., Victor Zaborsky, Tom Connolly, Esq. re: attorney/client communication	JDP
1369-72	7/26/07	4:26 PM	Joe Price to Dylan Ward, Kathleen Voelker, Esq., David Schertler, Esq., Victor Zaborsky, Tom Connolly, Esq. re: attorney/client communication	JDP
Duplicate of 1369-72	7/26/07	4:26 PM	Joe Price to Dylan Ward, Kathleen Voelker, Esq., David Schertler, Esq., Victor Zaborsky, Tom Connolly, Esq. re: attorney/client communication	JDP
1373-76	7/27/07	9:15 AM	Joe Price to David Schertler, Esq. re: attorney/client communication	JDP
Duplicate of 1373-76	7/27/07	9:15 AM	Joe Price to David Schertler, Esq. re: attorney/client communication	JDP
1377-80	7/29/07	4:48 PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Dylan Ward, Kathleen Voelker, Esq., Victor Zaborsky re: attorney/client communication	JDP
Duplicate of 1377-80	7/29/07	4:48 PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Dylan Ward, Kathleen Voelker, Esq., Victor Zaborsky re: attorney/client communication	JDP
1381-85	7/30/07	9:49 AM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Dylan Ward, Kathleen Voelker, Esq., Victor Zaborsky re:	JDP

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			attorney/client communication	
Duplicate of 1381-85	7/30/07	9:49 AM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Dylan Ward, Kathleen Voelker, Esq., Victor Zaborsky re: attorney/client communication	JDP
1386-90	7/30/07	10:09 AM	Joe Price to Tom Connolly, Esq. re: attorney/client communication	JDP
Duplicate of 1386-90	7/30/07	10:09 AM	Joe Price to Tom Connolly, Esq. re: attorney/client communication	JDP
1391-92	8/6/07	3:48 PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Victor Zaborsky, Kathleen Voelker, Esq., Dylan Ward re: attorney/client communication	JDP
Duplicate of 1391-92	8/6/07	3:48 PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Victor Zaborsky, Kathleen Voelker, Esq., Dylan Ward re: attorney/client communication	JDP
1393-94	8/6/07	4:02 PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Victor Zaborsky, Kathleen Voelker, Esq., Dylan Ward re: attorney/client communication	JDP
Duplicate of 1393-94	8/6/07	4:02 PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Victor Zaborsky, Kathleen Voelker, Esq., Dylan Ward re: attorney/client communication	JDP
1395-97	8/6/07	4:16 PM	Joe Price to David Schertler, Esq. re: attorney/client communication	JDP
Duplicate of 1395-97	8/6/07	4:16 PM	Joe Price to David Schertler, Esq. re: attorney/client communication	JDP
1398-1400	8/6/07	4:17 PM	Joe Price to Tom Connolly, Esq. re: attorney/client communication	JDP
Duplicate of 1398-1400	8/6/07	4:17 PM	Joe Price to Tom Connolly, Esq. re: attorney/client communication	JDP
1401-04	8/6/07	6:26 PM	Joe Price to David Schertler, Esq. re: attorney/client communication	JDP
Duplicate of 1401-04	8/6/07	6:26 PM	Joe Price to David Schertler, Esq. re: attorney/client communication	JDP
1404-07	8/7/07	4:45 PM	Joe Price to Kathleen Voelker, Esq., David Schertler, Esq., Tom Connolly, Esq., Victor Zaborsky, Dylan Ward re: attorney/client communication	JDP
Duplicate	8/7/07	4:45 PM	Joe Price to Kathleen Voelker, Esq., David	JDP

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of 1404-07			Schertler, Esq., Tom Connolly, Esq., Victor Zaborsky, Dylan Ward re: attorney/client communication	
1408-09	8/30/07	1:37 PM	Joe Price to Dylan Ward, Tom Connolly, Esq.; cc: Victor Zaborsky, Kathleen Voelker, Esq. forwarding Dylan Ward attorney/client communications	JDP
1165-69	11/20/07	11:30 AM	Joe Price to Dylan Ward and Victor Zaborsky re: emotional toll of investigation and personal family issues	Confidential.
1413-14	6/25/08 (2)	9:25 PM	Joe Price to David Schertler, Esq. and Danny Onorato, Esq. cc: Dylan Ward and Victor Zaborsky re: attorney/client communication	JDP
1415-16	6/26/08 (2)	7:13 AM	Joe Price to David Schertler, Esq. cc: Danny Onorato, Esq. re: attorney/client communication	JDP
1417-18	6/26/08 (2)	7:25 AM	Joe Price to David Schertler, Esq. cc: Danny Onorato, Esq. re: attorney/client communication	JDP
1419-21	6/26/08 (2)	11:01 AM	Joe Price to David Schertler, Esq. cc: Danny Onorato, Esq. re: attorney/client communication	JDP
1410-1412	6/26/08 (2)	5:26 PM	Joe Price to David Schertler, Esq., Danny Onorato, Esq. and Victor Zaborsky cc: Dylan Ward re: attorney/client communication	JDP
1422-24	6/28/08 (2)	1:52 PM	Joe Price to David Schertler, Esq. and Danny Onorato, Esq. cc: Victor Zaborsky and Dylan Ward re: attorney/client communication	JDP
1425-27	6/29/08 (2)	8:15 AM	Joe Price to David Schertler, Esq. re: attorney/client communication	JDP
1428-31	6/29/08 (2)	12:20 PM	Joe Price to David Schertler, Esq. re: attorney/client communication	JDP
1432-33	7/19/08 (2)	10:16 PM	Joe Price to David Schertler, Esq. re: attorney/client communication	JDP
1434-35	7/20/08 (2)	8:44 AM	Joe Price to David Schertler, Esq. re: attorney/client communication	JDP
1436-38	7/20/08 (2)	1:16 PM	Joe Price to David Schertler, Esq. re: attorney/client communication	JDP
1439-44	7/20/08 (2)	1:33 PM	Joe Price to David Schertler, Esq. re: attorney/client communication	JDP
1445-48	7/20/08 (2)	1:44 PM	Joe Price to David Schertler, Esq. re: attorney/client communication	JDP
1449-52	7/20/08	3:02 PM	Joe Price to David Schertler, Esq. re:	JDP

**PRIVILEGE LOG – ARENT FOX DISCS 6 & 7
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	(2)		attorney/client communication	
	7/20/08 (2)	3:20 PM	Joe Price to David Schertler, Esq. re: attorney/client communication	JDP
1467	7/22/08 (2)	9:57 AM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Kathleen Voelker, Esq. cc: Dylan Ward, Victor Zaborsky, Danny Onorato, Esq. and Robert Spagnoletti, Esq. re: attorney/client communication	JDP
1468	7/22/08 (2)	10:47 AM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Kathleen Voelker, Esq. cc: Dylan Ward, Victor Zaborsky, Danny Onorato, Esq. and Robert Spagnoletti, Esq. re: attorney/client communication	JDP
1469-70	7/22/08 (3)	10:50 AM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Kathleen Voelker, Esq. cc: Dylan Ward, Victor Zaborsky, Danny Onorato, Esq. and Robert Spagnoletti, Esq. re: attorney/client communication	JDP
1453-55	7/22/08 (2)	11:22 AM	Joe Price to David Schertler, Esq. re: attorney/client communication	JDP
1456-66	7/22/08 (2)	7:55 PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Kathleen Voelker, Esq. cc: Dylan Ward, Victor Zaborsky, Danny Onorato, Esq. and Robert Spagnoletti, Esq. re: attorney/client communication	JDP
1471-73	7/22/08 (2)	9:10 PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Kathleen Voelker, Esq. cc: Dylan Ward, Victor Zaborsky, Danny Onorato, Esq. and Robert Spagnoletti, Esq. re: attorney/client communication	JDP
1474-76	7/22/08 (2)	10:55 PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Kathleen Voelker, Esq. cc: Dylan Ward, Victor Zaborsky, Danny Onorato, Esq. and Robert Spagnoletti, Esq. re: attorney/client communication	JDP
1481	7/23/08	10:34 AM	Joe Price to David Schertler, Esq. cc: Dylan Ward, Victor Zaborsky and Danny Onorato, Esq. re: attorney/client communication	JDP
1482	7/23/08 (2)	12:57 PM	Joe Price to David Schertler, Esq. cc: Dylan Ward and Victor Zaborsky re: attorney/client communication	JDP
1483-84	7/23/08 (4)	1:04 PM	Joe Price to Dylan Ward cc: Victor Zaborsky attaching attorney/client communications and work product	JDP

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1477-78	7/23/08 (2)	1:32 PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Kathleen Voelker, Esq. cc: Dylan Ward, Victor Zaborsky, Danny Onorato, Esq. and Robert Spagnoletti, Esq. and Michael Starr, Esq. re: attorney/client communication	JDP
1479-80	7/23/08 (2)	1:40 PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Kathleen Voelker, Esq. cc: Dylan Ward, Victor Zaborsky, Danny Onorato, Esq. and Robert Spagnoletti, Esq. and Michael Starr, Esq. re: attorney/client communication	JDP
1485-86	7/23/08 (2)	3:20 PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Kathleen Voelker, Esq. cc: Dylan Ward, Victor Zaborsky, Danny Onorato, Esq., Robert Spagnoletti, Esq. and Michael Starr, Esq. re: attorney/client communication	JDP
1487-89	7/23/08 (2)	3:28 PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Kathleen Voelker, Esq. cc: Dylan Ward, Victor Zaborsky, Danny Onorato, Esq. and Robert Spagnoletti, Esq. and Michael Starr, Esq. re: attorney/client communication	JDP
1490-93	7/23/08 (2)	3:31 PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Kathleen Voelker, Esq. cc: Dylan Ward, Victor Zaborsky, Danny Onorato, Esq. and Robert Spagnoletti, Esq. and Michael Starr, Esq. re: attorney/client communication	JDP
1494-97	7/23/08 (2)	3:32 PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Kathleen Voelker, Esq. Victor Zaborsky, Danny Onorato, Esq. cc: Dylan Ward, Robert Spagnoletti, Esq. and Michael Starr, Esq. re: attorney/client communication	JDP
1498-1501	7/23/08 (2)	4:08 PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Kathleen Voelker, Esq. cc: Dylan Ward, Victor Zaborsky, Danny Onorato, Esq. and Robert Spagnoletti, Esq. and Michael Starr, Esq. re: attorney/client communication	JDP
1502-05	7/23/08 (2)	4:17 PM	Joe Price to David Schertler, Esq. re: attorney/client communication	JDP

**PRIVILEGE LOG – ARENT FOX DISCS 6 & 7
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1506-10	7/23/08 (2)	4:35 PM	Joe Price to David Schertler, Esq. re: attorney/client communication	JDP
1511-14	7/23/08 (2)	4:36 PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Kathleen Voelker, Esq. cc: Dylan Ward, Victor Zaborsky, Danny Onorato, Esq. and Robert Spagnoletti, Esq. and Michael Starr, Esq. re: attorney/client communication	JDP
1515-16	7/24/08 (2)	8:18 AM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Kathleen Voelker, Esq. cc: Dylan Ward, Victor Zaborsky, Danny Onorato, Esq. and Robert Spagnoletti, Esq. and Michael Starr, Esq. re: attorney/client communication	JDP
1517-19	7/24/08 (2)	1:22 PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Kathleen Voelker, Esq. cc: Dylan Ward, Victor Zaborsky, Danny Onorato, Esq. and Robert Spagnoletti, Esq. and Michael Starr, Esq. re: attorney/client communication	JDP
1520-22	7/24/08 (2)	1:27 PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Kathleen Voelker, Esq. cc: Dylan Ward, Victor Zaborsky, Danny Onorato, Esq. and Robert Spagnoletti, Esq. and Michael Starr, Esq. re: attorney/client communication	JDP
1523-25	7/24/08 (2)	1:28 PM	Joe Price to David Schertler, Esq. re: attorney/client communication	JDP
1526-28	7/24/08 (2)	1:57 PM	Joe Price to Tom Connolly, Esq. re: attorney/client communication	JDP
1529-31	7/25/08	11:10 AM	Joe Price to Dylan Ward cc: Victor Zaborsky re: investigation	Produced.
1532-34	7/25/08	11:28 AM	Joe Price to Dylan Ward cc: Victor Zaborsky re: investigation	Produced.
1535-1638	7/27/08 (2)	3:19 PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Danny Onorato, Esq. and Kathleen Voelker, Esq. cc: Dylan Ward and Victor Zaborsky	JDP
1639-1708	7/27/08 (4)	6:29 PM	Joe Price to David Schertler, Esq. re: attorney/client communication	JDP
1709-11	7/29/08	8:45 AM	Joe Price to Dylan Ward re: forwarding Dylan Ward attorney/client communications	JDP.
1709R-11R	7/29/08	8:45 AM	Joe Price to Dylan Ward re: forwarding Dylan Ward attorney/client communications	JDP. Redacted.

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1712-14	7/29/08	8:54 AM	Joe Price to Dylan Ward re: forwarding Dylan Ward attorney/client communications	JDP.
1712R-14R	7/29/08	8:54 AM	Joe Price to Dylan Ward re: forwarding Dylan Ward attorney/client communications	JDP. Redacted.
1715-1717	7/29/08	8:54 am	Joe Price to Dylan Ward re: attorney/client communication	JDP.
1715R-1717R	7/29/08	8:54 am	Joe Price to Dylan Ward re: attorney/client communication	JDP. Redacted.
1718-19	7/29/08 (2)	12:07 PM	Joe Price to Tom Connolly, Esq., David Schertler, Esq., Kathleen Voelker, Esq. cc: Dylan Ward and Victor Zaborsky re: attorney/client communication	JDP
1720	7/29/08 (2)	3:49 PM	Joe Price to Tom Connolly, Esq., David Schertler, Esq., Kathleen Voelker, Esq. cc: Dylan Ward, Victor Zaborsky, Danny Onorato, Esq. and Robert Spagnoletti, Esq. re: attorney/client communication	JDP
1721-22	7/29/08	4:59 PM	Joe Price to Tom Connolly, Esq., David Schertler, Esq., Kathleen Voelker, Esq. cc: Dylan Ward and Victor Zaborsky re: attorney/client communication	JDP
1723-25	7/29/08	5:21 PM	Joe Price to Tom Connolly, Esq., David Schertler, Esq., Kathleen Voelker, Esq. cc: Dylan Ward and Victor Zaborsky re: attorney/client communication	JDP
1726-27	7/29/08	5:21 PM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communications	JDP.
Duplicate of 1726-27	7/29/08	5:21 PM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communications	JDP
1726R-27R	7/29/08	5:21 PM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communications	JDP. Redacted.
1728	7/30/08 (2)	12:41 PM	Joe Price to David Schertler, Esq., Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Robert Spagnoletti, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
1729-30	7/30/08 (2)	7:09 PM	Joe Price to David Schertler, Esq., Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Robert Spagnoletti, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
1731-32	7/30/08	7:12 PM	Joe Price to Victor Zaborsky forwarding	JDP

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	(2)		Dylan Ward attorney/client communication; spousal privilege	SP
1733-34	7/31/08 (2)	9:56 AM	Joe Price to David Schertler, Esq., Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Robert Spagnoletti, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
1735-37	8/1/08 (3)	9:40 AM	Joe Price to David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
1738-1741	8/1/08 (3)	1:23 PM	Joe Price to David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
1742-45	8/4/08 (3)	10:05 AM	Joe Price to David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
1746-47	8/5/08 (2)	5:27 PM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communications	JDP.
1746R-47R	8/5/08 (2)	5:27 PM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communications	JDP. Redacted.
1748-49	8/6/08 (2)	9:27 AM	Joe Price to David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
1750-51	8/11/08	9:59 AM	Joe Price to Dylan Ward and Victor Zaborsky re: draft attorney/client communication	JDP AWP
1752-54	8/12/08 (2)	10:59 AM	Joe Price to David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
1755-58	8/13/08 (2)	7:57 AM	Joe Price to David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
1759-60	8/15/08	4:26 PM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communications	JDP
1761-62	8/18/08 (2)	6:52 AM	Joe Price to David Schertler, Esq., Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Robert Spagnoletti, Esq., Tom Connolly, Esq. and	JDP

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			Victor Zaborsky re: attorney/client communication	
1763-65	8/21/08 (2)	10:42 (10.43) AM	Joe Price to Tom Connolly, Esq., David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq., and Victor Zaborsky re: attorney/client communication	JDP
1766-69	8/27/08	10:16 (10:15) AM	Joe Price to Tom Connolly, Esq. and David Schertler, Esq. cc: Dylan Ward, Victor Zaborsky and Kathleen Voelker, Esq. re: attorney/client communication	JDP
1770-71	8/28/08	2:55 (2:56) PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq. and Kathleen Voelker, Esq. cc: Dylan Ward and Victor Zaborsky re: attorney/client communication	JDP
1772-75	8/28/08	2:58 (2:59) PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq. and Kathleen Voelker, Esq. cc: Dylan Ward and Victor Zaborsky re: attorney/client communication	JDP
1776-78	8/28/08	3:38 (3:39) PM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communication	JDP
1779-81	8/28/08	3:46 (3:47) PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq. and Kathleen Voelker, Esq. cc: Dylan Ward and Victor Zaborsky re: attorney/client communication	JDP
1782-85	8/28/08	3:50 PM	Joe Price to Tom Connolly, Esq. cc: Victor Zaborsky re: attorney/client communication	JDP
1786-89	8/28/08	4:03 (4:04) PM	Joe Price to Tom Connolly, Esq. cc: Victor Zaborsky re: attorney/client communication	JDP
1790-93	8/28/08	4:39 (4:40) PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq. and Kathleen Voelker, Esq. cc: Dylan Ward and Victor Zaborsky re: attorney/client communication	JDP
1794-98	8/28/08	5:26 PM	Joe Price to David Schertler, Esq., Victor Zaborsky, Tom Connolly, Esq. and Kathleen Voelker, Esq. cc: Dylan Ward re: attorney/client communication	JDP
1799-1804	8/28/08	5:27 PM	Joe Price to David Schertler, Esq., Victor Zaborsky, Tom Connolly, Esq. and Kathleen Voelker, Esq. cc: Dylan Ward re: attorney/client communication	JDP
1805-07	8/29/08 (2)	10:04 (10:05) AM	Tom Connolly, Esq. to Joe Price, David Schertler, Esq., Kathleen Voelker, Esq. cc: Dylan Ward and Victor Zaborsky re: attorney/client communication	JDP

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(From Files Entitled “Dylan Dylan Ward,” DylanDylan Ward” and “SavorMassage01”)
Civil Action No. 0008315-08**

1808-10	8/29/08 (2)	11:14 AM	Joe Price to David Schertler, Esq., Tom Connolly, Esq. and Kathleen Voelker, Esq. cc: Dylan Ward and Victor Zaborsky re: attorney/client communication	JDP
1811-14	8/29/08 (2)	12:37 PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq. and Kathleen Voelker, Esq. cc: Dylan Ward and Victor Zaborsky re: attorney/client communication	JDP
1815-20	8/29/08 (2)	2:33 PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq. and Kathleen Voelker, Esq. cc: Dylan Ward and Victor Zaborsky re: attorney/client communication	JDP
1821	9/15/08 (2)	10:19 AM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communications	JDP
1822	9/15/08	6:02 PM	Joe Price to David Schertler, Esq. and Dylan Ward cc: Victor Zaborsky re: attorney/client communication	JDP
1823-26	9/18/08 (2)	3:25 PM	Joe Price to David Schertler, Esq. re: attorney/client communication	JDP
1827-30	9/30/08	11:04 PM (2)	Joe Price to David Schertler, Esq. re: attorney/client communication	JDP
1831	10/29/08 (2)	9:51 (9:52) AM	Joe Price to David Schertler, Esq., Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Spangnoletti, Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
1832-33	10/29/08 (2)	10:26 AM	Joe Price to Danny Onorato, Esq. re: attorney/client communication	JDP
1834-35	10/29/08 (2)	10:27 (10:28) AM	Joe Price to Danny Onorato, Esq. re: attorney/client communication	JDP
1836-37	10/29/08 (2)	10:28 (10:27) AM	Danny Onorato, Esq. to Joe Price re: attorney/client communication	JDP
1838-40	10/30/08 (2)	6:48 AM	Joe Price to David Schertler, Esq., Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Robert Spagnoletti, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
2467-68	10/30/08 (2)	3:58 (3:59) PM	David Schertler, Esq. to Joe Price, Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Robert Spagnoletti, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP

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1841-44	10/30/08 (2)	4:19 (4:18) PM	David Schertler, Esq. to Danny Onorato, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Joe Price, Dylan Ward, Michael Starr, Esq., Robert Spagnoletti, Esq. and Victor Zaborsky re: attorney/client communication	JDP
1845-48	10/30/08 (2)	5:31 PM	Victor Zaborsky to David Schertler, Esq., Danny Onorato, Esq., Tom Connolly, Esq. cc: Kathleen Voelker, Esq., Joe Price, Dylan Ward, Michael Starr, Esq. and Robert Spagnoletti, Esq. re: attorney/client communication	JDP
1849-51	10/31/08 (2)	8:15 (8:16) AM	David Schertler, Esq. to Joe Price Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Spagnoletti, Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
1852-54	10/31/08 (2)	8:19 AM	Joe Price to David Schertler, Esq., Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Spagnoletti, Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
1855-57	10/31/08 (2)	8:21 AM	Joe Price to David Schertler, Esq., Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Spagnoletti, Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
1858-61	10/31/08 (2)	8:24 AM	Joe Price to David Schertler, Esq., Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Spagnoletti, Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
1862-65	10/31/08 (2)	8:44 (8:45) AM	David Schertler, Esq. to Joe Price, Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Spagnoletti, Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
1866-69	10/31/08 (2)	9:49 (9:48) AM	David Schertler, Esq. to Joe Price, Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Spagnoletti, Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
1870-73	10/31/08 (2)	9:50 (9:49) AM	Joe Price to David Schertler, Esq., Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq.,	JDP

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			Spangnoletti, Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	
1874-76	10/31/08 (2)	9:51 (9:52) AM	Tom Connolly, Esq. to Joe Price to David Schertler, Esq., Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Spangnoletti, and Victor Zaborsky re: attorney/client communication	JDP
1877-80	10/31/08 (2)	10:47 AM	Danny Onorato, Esq. to Joe Price to David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Spangnoletti, Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
1881-85	10/31/08 (2)	11:01 (11:00) AM	Joe Price to Danny Onorato, Esq. re: attorney/client communication	JDP
1886-90	10/31/08 (2)	11:01 (11:02) AM	Danny Onorato, Esq. to Joe Price re: attorney/client communication	JDP
1891-95	10/31/08 (2)	11:05 AM	Joe Price to Danny Onorato, Esq. cc: David Schertler, Esq., Tom Connolly, Esq. and Kathleen Voelker, Esq. re: attorney/client communication	JDP
1896-1901	10/31/08 (2)	11:08 (11:07) AM	Joe Price to Danny Onorato, Esq. cc: David Schertler, Esq., Tom Connolly, Esq. and Kathleen Voelker, Esq. re: attorney/client communication	JDP
1902-07	10/31/08 (2)	11:06 (11:07) AM	Danny Onorato, Esq. to Joe Price cc: David Schertler, Esq., Tom Connolly, Esq. and Kathleen Voelker, Esq. re: attorney/client communication	JDP
1908-13	10/31/08 (2)	11:09 (11:10) AM	Danny Onorato, Esq. to Joe Price re: attorney/client communication	JDP
1914-19	10/31/08 (2)	11:12 AM	Joe Price to Danny Onorato, Esq. re: attorney/client communication	JDP
1920-24	10/31/08 (2)	11:37 (11:39) AM	Victor Zaborsky to Danny Onorato, Esq., Tom Connolly, Esq., Joe Price, David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq. and Robert Spagnoletti, Esq. re: attorney/client communication	JDP
1025-29	10/31/08 (2)	11:40 (11:39) AM	Joe Price to David Schertler, Esq., Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Spangnoletti, Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
1930-34	10/31/08	11:46 (11:45)	David Schertler, Esq. to Victor Zaborsky, Joe	JDP

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	(2)	AM	Price, Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Spagnoletti, Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	
1935-39	10/31/08 (2)	11:47 (11:48) AM	Joe Price to David Schertler, Esq., Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Robert Spagnoletti, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
1940-44	10/31/08 (2)	11:49 (11:50) AM	Tom Connolly, Esq. to Joe Price , David Schertler, Esq., Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Robert Spagnoletti, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
1945-50	10/31/08 (2)	11:50 (11:51) AM	Danny Onorato, Esq. to Joe Price, David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Robert Spagnoletti, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
1951-56	10/31/08 (2)	11:54 (11:55) AM	Victor Zaborsky to Danny Onorato, Esq., Joe Price, David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Spagnolett, Tom Connolly, Esq. re: attorney/client communication	JDP
1957-62	10/31/08 (2)	12:28 (12:29) PM	Danny Onorato, Esq. to Joe Price, David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Robert Spagnoletti, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
1963-68	10/31/08 (2)	12:32 PM	Joe Price to David Schertler, Esq., Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Spagnoletti, Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
1969-75	10/31/08 (2)	12:35 PM	Kathleen Voelker, Esq. to Joe Price, Danny Onorato, Esq., Victor Zaborsky, Tom Connolly, Esq., David Schertler, Esq., Michael Starr, Esq. and Robert Spagnoletti, Esq. re: attorney/client communication	JDP
1976-82	10/31/08	12:39 PM	Kathleen Voelker, Esq. to Joe Price re:	JDP

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	(2)		attorney/client communication	
1983-91	10/31/08 (2)	1:54 (1:55) PM	Kathleen Voelker, Esq. to David Schertler, Esq., Danny Onorato, Esq., Joe Price, Victor Zaborsky, Tom Connolly, Esq., Dylan Ward, Michael Starr, Esq. and Robert Spagnoletti, Esq. re: attorney/client communication	JDP
1992-97	10/31/08 (2)	3:18 PM	Joe Price to Dylan Ward family inadvertently forwarding attorney/client correspondence	JDP – Produced with redactions
1998-2000	11/3/08 (2)	9:32 AM	Joe Price to David Schertler, Esq., Bernard Grimm, Esq., Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Robert Spagnoletti, Esq., Tom Connolly, Esq., V. Jennings, Esq., Victor Zaborsky re: attorney/client communication	JDP
2001-02	11/3/08 (2)	9:42 (9:38) AM	Bernard Grimm, Esq. to Joe Price re: attorney/client communication	JDP
	11/3/08 (2)	9:43 AM	Joe Price to Bernard Grimm, Esq. re: attorney/client communication	JDP
2003-04	11/3/08 (2)	9:52 (9:51) AM	Bernard Grimm, Esq. to Joe Price re: attorney/client communication	JDP
2005-06	11/3/08 (2)	9:58 AM	Joe Price to Bernard Grimm, Esq. re: attorney/client communication	JDP
2007-09	11/3/08 (2)	10:44 AM	Joe Price to Bernard Grimm, Esq. re: attorney/client communication	JDP

“Dylan Ward.pst” Folder: (Disc 7)

Bates #	Date	Time	Parties	Privilege
2010-11	1/4/06	4:47 PM	Joe Price to Dylan Ward re: Equality Virginia website	AFAC
2012-13	1/4/06	4:57 PM	Joe Price to Dylan Ward re: Equality Virginia	AFAC
2014-16	1/6/06	1:11 PM	Joe Price to Dylan Ward re: Equality Virginia event	AFAC
2017-19	1/9/06	9:45 AM	Joe Price to Dylan Ward, Jay Squires, Dyana Mason, and Molly McClintock re: Equality Virginia	AFAC
2020-22	1/9/06 (2)	11:07 AM	Joe Price to Dylan Ward re: Equality Virginia donors	AFAC
2023-26	1/9/06 (2)	11:14 AM	Dylan Ward to Joe Price re: Equality Virginia donors	AFAC
2027-28	1/12/06	4:38 PM	Dylan Ward to Joe Price re: Equality Virginia	AFAC
2029-30	1/18/06	9:37 AM	Joe Price to Dylan Ward re: new sponsor and	AFAC

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			dinner committee Equality Virginia	
2031	1/18/06	9:49 AM	Joe Price to Dylan Ward re: speaker and Equality Virginia	AFAC
2032-34	1/18/06	9:54 AM	Joe Price to Dylan Ward re: new sponsor and dinner committee Equality Virginia	AFAC
2035-37	1/30/06	2:47 PM	Joe Price to Dylan Ward, Victor Zaborsky, Mark Allen Smith re: Equality Virginia	AFAC
2038	1/30/06	3:32 PM	Joe Price to Dylan Ward re: advertisement for Equality Virginia	AFAC
2039-40	2/6/06	12:55 PM	Joe Price to members of Equality Virginia re: event planning	AFAC
2041-44	2/6/06	3:22 PM	Dylan Ward to Joe Price re: Equality Virginia advertisement	AFAC
2045-46	2/14/06	10:12 AM	Joe Price to Victor Zaborsky and Dylan Ward re: Equality Virginia location for silent auction	AFAC
2047-49	2/14/06	10:25 AM	Joe Price to Dylan Ward and Victory Zaborsky re: Equality Virginia silent auction donation	AFAC
2050-51	2/24/06	4:55 PM	Joe Price to Dylan Ward re: hotel arrangements for Equality Virginia event	AFAC
2052-54	2/24/06	5:14 PM	Joe Price to Dylan Ward re: hotel arrangements for Equality Virginia event	AFAC
2055	3/9/06	1:22 PM	Joe Price forwarding email to Equality Virginia members from H. Vargas re: event	AFAC
2056-57	3/9/06	1:27 PM	Joe Price to Dyana Mason, Dylan Ward and Beth Kozlow re: Equality Virginia dinner	AFAC
2058-60	3/20/06	3:39 PM	Joe Price to Dylan Ward forwarding email from Sarah Morgan re: Equality Virginia advertisement	AFAC
2061-62	3/22/06	5:57 PM	Joe Price to Dylan Ward forwarding dinner budget for Equality Virginia	AFAC
2063-64	4/13/06	11:27 AM	Joe Price to Jay Frisette, Dylan Ward, Jay Squires, cc: Mark Allen Smith re: Equality Virginia board nominations	AFAC
2065-66	5/11/06	11:41 AM	Joe Price to Dylan Ward re: Equality Virginia donation	AFAC
2067-68	5/11/06	11:49 AM	Joe Price to Dylan Ward re: Equality Virginia donation	AFAC
2069	5/16/06	4:20 PM	Joe Price to Molly McClintock, Dylan Ward, cc: Bess Kozlow re: Equality Virginia	AFAC

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2070	5/25/06	11:04 AM	Joe Price to Dylan Ward re: Equality Virginia ballot	AFAC
2071-74	5/25/06	12:06 PM	Joe Price to Dylan Ward forwarding Price biography for Equality Virginia ballot	AFAC
2075-77	8/9/06 (2)	4:28 PM	Joe Price to Dylan Ward re: attorney/client communication	JDP.
2075R-77R	8/9/06 (2)	4:28 PM	Joe Price to Dylan Ward re: attorney/client communication	JDP. Redacted. Confidential.

2078	8/12/06 (2)	4:38 PM	Joe Price to Kathleen Voelker, Esq., David Schertler, Esq., Dylan Ward and Victor Zaborsky re: attorney/client communication	JDP
2079-80	8/13/06 (2)	10:43 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Dylan Ward and Victor Zaborsky re: attorney/client communication	JDP
2081-82	8/15/06 (2)	10:48 PM	Joe Price to Dylan Ward cc: Victor Zaborsky forwarding Dylan Ward attorney client communication/work product	JDP AWP
2083-84	8/16/06	7:52 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Dylan Ward and Victor Zaborsky re: attorney/client communication - work product	JDP
2085-86	8/16/06	8:01 AM	David Schertler, Esq. to Joe Price, Kathleen Voelker, Esq., Dylan Ward and Victor Zaborsky re: attorney/client communication - work product	JDP
2087-89	8/16/06	8:33 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Dylan Ward and Victor Zaborsky re: attorney/client communication - work product	JDP
2090	8/16/06	9:17 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Dylan Ward and Victor Zaborsky re: attorney/client communication - work product	JDP
2091	8/17/06 (2)	10:09 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Dylan Ward and Victor	JDP

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			Zaborsky re: attorney/client communication – work product	
2092-93	8/17/06	10:30 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Dylan Ward, Victor Zaborsky and Tom Connolly, Esq. re: attorney/client communication – work product	JDP
2094	8/28/06 (2)	4:02 PM	Joe Price to Dylan Ward and Victor Zaborsky re: investigation and Washington Post article re: same	Produced.
2095-96	9/25/06	12:25PM	Joe Price to David Schertler, Esq., Dylan Ward and Victor Zaborsky	JDP
2097	10/4/06	11:50 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Dylan Ward, Victor Zaborsky, Richardson and Tom Connolly, Esq.	JDP
2098	10/05/06	3:53 PM	Dylan Ward to Joe Price re: attorney/client meeting	Produced.
2083	10/5/06	3:53 PM	Joe Price to Dylan Ward and Victor Zaborsky re: attorney/client meeting	JDP
2099	10/5/06	4:38 PM	Joe Price to Dylan Ward re: attorney/client meeting	Produced.
2100	10/6/06	8:45 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., Dylan Ward and Victor Zaborsky re: attorney/client communication – work product	JDP
2101	10/6/06	3:16 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., Dylan Ward and Victor Zaborsky re: attorney/client communication – work product	JDP
2102	10/25/06 (2)	4:14 PM	Joe Price to Dylan Ward and Victor Zaborsky re: hate mail due to investigation	Confidential.
2103	10/25/06 (2)	4:28 PM	Joe Price to Dylan Ward re: hate mail due to investigation	Confidential.
2104	11/2/06	4:13 PM	Joe Price to Dylan Ward re: attorney/client meeting	Produced.
2105	11/6/06	3:54 PM	Kathleen Voelker, Esq. to Joe Price, David Schertler, Esq., Tom Connolly, Esq., Dylan Ward and Victor Zaborsky re: attorney/client communication	JDP
2106-08	11/7/06	11:55 AM	Joe Price to David Schertler, Esq., Kathleen	JDP

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			Voelker, Esq., Dylan Ward cc: Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	
2109-10	11/7/06	1:19 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Dylan Ward cc: Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
2111-13	11/7/06	1:40 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Dylan Ward cc: Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
2114-16	11/7/06	1:41 PM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communication	JDP.
2114R-16R	11/7/06	1:41 PM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communication	JDP. Redacted.
2117-19	11/7/06	5:34 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Dylan Ward cc: Tom Connolly, Esq. and Victor Zaborsky and Michael Starr, Esq. re: attorney/client communication	JDP
2120-23	11/8/06 (2)	1:34 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Dylan Ward cc: Tom Connolly, Esq. and Victor Zaborsky and Michael Starr, Esq. re: attorney/client communication	JDP
2124-26	11/8/06	3:12 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Dylan Ward, Tom Connolly, Esq. cc: Victor Zaborsky and Michael Starr, Esq. re: attorney/client communication	JDP
2127-29	11/8/06	3:13 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Dylan Ward, Tom Connolly, Esq. cc: Victor Zaborsky and Michael Starr, Esq. re: attorney/client communication	JDP
2130-34	11/8/06	4:29 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Dylan Ward, Tom Connolly, Esq., Victor Zaborsky cc: Michael Starr, Esq. re: attorney/client communication	JDP
2135	11/20/06	11:34 AM	Joe Price to Kathleen Voelker, Esq., David Schertler, Esq., Dylan Ward cc: Tom Connolly, Esq., Victor Zaborsky and Michael Starr, Esq. re: attorney/client communication	JDP

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2136-37	11/20/06	12:19 PM	Joe Price to Kathleen Voelker, Esq., David Schertler, Esq., Dylan Ward cc: Tom Connolly, Esq., Victor Zaborsky and Michael Starr, Esq. re: attorney/client communication	JDP
2138-39	11/21/06	9:51 AM	Joe Price to Kathleen Voelker, Esq., David Schertler, Esq., Dylan Ward cc: Tom Connolly, Esq., Victor Zaborsky and Michael Starr, Esq. re: attorney/client communication	JDP
2140-42	11/21/06	12:18 PM	Joe Price to Kathleen Voelker, Esq., David Schertler, Esq., Dylan Ward cc: Tom Connolly, Esq., Victor Zaborsky and Michael Starr, Esq. re: attorney/client communication	JDP
2143-45	11/21/06	12:25 PM	Joe Price to Kathleen Voelker, Esq., David Schertler, Esq., Dylan Ward, Tom Connolly, Esq. cc: Victor Zaborsky re: attorney/client communication	JDP
2146-47	12/6/06 (2)	10:24 AM	Joe Price to Dylan Ward, Kathleen Voelker, Esq., David Schertler, Esq., Tom Connolly, Esq. Victor Zaborsky re: attorney/client communication	JDP
2148-49	12/6/06 (2)	12:34 PM	Joe Price to Dylan Ward, Kathleen Voelker, Esq., David Schertler, Esq., Tom Connolly, Esq. Victor Zaborsky re: attorney/client communication	JDP
2150-51	12/7/06	11:11 AM	Dylan Ward to Joe Price, Kathleen Voelker, Esq., David Schertler, Esq. re: attorney/client communication	JDP
2152-53	12/27/06	8:34 AM	David Schertler, Esq. to Joe Price, Kathleen Voelker, Esq., Tom Connolly, Esq., Victor Zaborsky and Dylan Ward re: attorney/client communication	JDP
2154-57	1/8/07 (2)	10:36 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., Victor Zaborsky and Dylan Ward re: attorney/client communication	JDP
2158-62	1/9/07 (2)	8:49 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., Victor Zaborsky and Dylan Ward re: attorney/client communication	JDP
2163	1/9/07	2:34 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., Victor	JDP

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			Zaborsky and Dylan Ward re: attorney/client communication	
2164	1/9/07	2:56 PM	Joe Price to Dylan Ward re: attorney/client communication	Produced.
2165-66	1/9/07	3:06 PM	Joe Price to Dylan Ward re: attorney/client communication	JDP
2167-68	1/9/07	3:11 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., Victor Zaborsky and Dylan Ward re: attorney/client communication	JDP
2169-71	1/15/07	11:43 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., Victor Zaborsky and Dylan Ward re: attorney/client communication	JDP
2172	1/15/07	4:25 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., Victor Zaborsky and Dylan Ward re: attorney/client communication	JDP
2173-74	1/16/07	9:50 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., Victor Zaborsky and Dylan Ward re: attorney/client communication	JDP
2175	1/17/07	1:47 PM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communication	JDP
2176	1/17/07	3:05 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., Victor Zaborsky and Dylan Ward re: attorney/client communication	JDP
2177	1/17/07	4:10 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., Victor Zaborsky and Dylan Ward re: attorney/client communication	JDP
2178	1/17/07	4:14 PM	Joe Price to Victor Zaborsky, Dylan Ward and David Schertler, Esq. re: attorney/client communication	JDP
1245-53	1/17/07 (2)	5:04 PM	Dylan Ward to David Schertler, Esq. and Joe Price re: attorney/client communication	JDP
2179	1/18/07	5:25 PM	Joe Price to David Schertler, Esq. and Dylan Ward re: attorney/client communication	JDP
2180	1/25/07 (2)	1:14 PM	Joe Price to David Schertler, Esq. and Dylan Ward cc: Kathleen Voelker, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP

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2182-84	1/25/07 (2)	4:05 PM	Joe Price to Dylan Ward and Victor Zaborsky re: investigation	JDP SP
2185-87	1/30/07 (2)	8:53 AM	Joe Price to David Schertler, Esq. and Dylan Ward cc: Victor Zaborsky re: attorney/client communication	JDP
2188-91	1/31/07 (2)	8:33 AM	Joe Price to David Schertler, Esq., Dylan Ward and Victor Zaborsky re: attorney/client communication	JDP
2192-94	2/2/07 (2)	5:16 PM	Joe Price to Dylan Ward and Victor Zaborsky forwarding attorney/client communication/work product	JDP
2195-97	2/2/07 (2)	5:29 PM	Joe Price to Dylan Ward and Victor Zaborsky forwarding attorney/client communication/work product	JDP
1170	2/8/07	9:41 AM	Joe Price to Dylan Ward re: confiscated items/passport and providing legal advise	Produced.
1171-72	2/8/07	9:47 AM	Joe Price to Dylan Ward re: confiscated items/passport and providing legal advise	Confidential.
1173-74	2/8/07	9:55 AM	Joe Price to Dylan Ward re: confiscated items/passport and providing legal advise	Confidential.
1175-77	2/8/07	10:21 AM	Joe Price to Dylan Ward re: confiscated items/passport and providing legal advise	Confidential.
1178-81	2/8/07	10:26 AM	Joe Price to Dylan Ward re: confiscated items/passport and providing legal advise	Confidential.
2198-99	2/8/07	10:39 AM	Joe Price to David Schertler, Esq. and Dylan Ward re: attorney/client communication	JDP
2200-01	2/8/07	11:46 AM	Joe Price to David Schertler, Esq. and Dylan Ward re: attorney/client communication	JDP
2202	2/20/07	5:32 PM	Joe Price to Dylan Ward re: status of confiscated items per David Schertler, Esq.	JDP
2203-04	2/20/07	5:37 PM	Joe Price to Dylan Ward re: status of confiscated items per David Schertler, Esq.	JDP.
2203R-04R	2/20/07	5:37 PM	Joe Price to Dylan Ward re: status of confiscated items per David Schertler, Esq.	JDP. Redacted Confidential.
2205	2/21/07	5:57 PM	Joe Price to David Schertler, Esq. and Dylan Ward cc: Victor Zaborsky, Tom Connolly, Esq. and Kathleen Voelker, Esq. re: attorney/client communications	JDP AWP
2206-07	2/21/07	6:02 PM	Joe Price to David Schertler, Esq. and Dylan Ward cc: Victor Zaborsky, Tom	JDP

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(From Files Entitled “Dylan Dylan Ward,” DylanDylan Ward” and “SavorMessage01”)
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			Connolly, Esq. and Kathleen Voelker, Esq. re: attorney/client communications	
2208-09	2/21/07	7:50 PM	Joe Price to David Schertler, Esq. and Dylan Ward, Victor Zaborsky, Tom Connolly, Esq. and Kathleen Voelker, Esq. re: attorney/client communications	JDP
2210	2/21/07	7:50 PM	Joe Price to Dylan Ward and Victor Zaborsky re: evidence for investigation	JDP.
2210R	2/21/07	7:50 PM	Joe Price to Dylan Ward and Victor Zaborsky re: evidence for investigation	JDP. Redacted.
2211-12	2/22/07	8:30 AM	Joe Price to David Schertler, Esq., Dylan Ward and Victor Zaborsky re: attorney/client communications	JDP
2213-14	2/22/07	11:49 AM	Joe Price to David Schertler, Esq., Dylan Ward, Tom Connolly, Esq. and Kathleen Voelker, Esq. cc: Victor Zaborsky re: attorney/client communications	JDP
2215-16	2/22/07	12:30 PM	Joe Price to David Schertler, Esq., Dylan Ward, Tom Connolly, Esq. and Kathleen Voelker, Esq. cc: Victor Zaborsky re: attorney/client communications	JDP
2217	2/22/07	1:48 PM	Joe Price to David Schertler, Esq., Dylan Ward, Tom Connolly, Esq. and Kathleen Voelker, Esq. cc: Victor Zaborsky re: attorney/client communications	JDP
2218	2/22/07	10:32 PM	Joe Price to David Schertler, Esq., Dylan Ward and Victor Zaborsky re: attorney/client communications	JDP
2219	2/23/07	1:36 PM	Joe Price to Dylan Ward re: attorney/client meeting	Produced.
2220-21	2/23/07	2:01 PM	Joe Price to Dylan Ward re: attorney/client meeting	Produced.
2222-23	2/23/07	2:26 PM	Joe Price to Dylan Ward and Victor Zaborsky re: attorney/client meeting	Produced.
2224-25	2/23/07	2:43 PM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communication	Produced.
2226	2/26/07	2:51 PM	Joe Price to David Schertler, Esq. and Dylan Ward re: attorney/client communications	JDP
2227-28	3/2/07	9:07 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., Zaborsy and Dylan Ward re: attorney/client communications	JDP

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2229	3/26/07	8:03 AM	Joe Price to Dylan Ward re: investigation	Produced.
2230	3/26/07	12:24 PM	Dylan Ward to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., Joe Price and Victor Zaborsky re: attorney/client communications	JDP
2231	3/26/07	12:34 PM	Joe Price to Dylan Ward, David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communications	JDP
2232	3/26/07	12:48 PM	Joe Price to Victor Zaborsky and Dylan Ward re: investigation	JDP
2233	3/26/07	12:50 PM	Joe Price to Dylan Ward and Victor Zaborsky re: investigation	JDP
2234	3/26/07	2:13 PM	Joe Price to Dylan Ward cc: Victor Zaborsky re: press related to the investigation	Produced.
2235-36	3/26/07	6:04 PM	David Schertler, Esq. to Joe Price, Dylan Ward, Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky re: attorney/client communications	JDP
2237-39	3/26/07	6:11 PM	Joe Price to David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communications	JDP
2240-41	3/27/07	10:19 AM	Joe Price to David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communications	JDP
2242-43	5/2/07 (2)	9:53 AM	Joe Price to Dylan Ward re: press related to investigation and accusations	Confidential.
2244-47	5/7/07 (2)	8:13 PM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communication	JDP
2248-52	5/8/07 (2)	10:21 AM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communication	JDP
2253-57	5/8/07 (2)	10:21 AM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communication	JDP
2258-62	5/8/07 (2)	10:21 AM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communication	JDP
2263-67	5/8/07 (2)	10:21 AM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communication	JDP
2268-71	5/16/07	11:20 AM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communication	JDP
2272-76	5/16/07	11:46 AM	Joe Price to Dylan Ward cc: Victor	JDP

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			Zaborsky forwarding attorney/client communication	
1182-84	6/28/07	2:11 PM	Joe Price to Dylan Ward re: theft investigation	JDP.
1182R-84R	6/28/07	2:11 PM	Joe Price to Dylan Ward re: theft investigation	JDP. Redacted.
2277-79	7/18/07	1:52 PM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communication/work product	Produced.
2280-82	7/20/07	10:52 AM	Joe Price to Dylan Ward, Kathleen Voelker, Esq., David Schertler, Esq., Tom Connolly, Esq. cc: Victor Zaborsky re: attorney/client communications	JDP
2283-84	7/20/07	11:42 AM	Joe Price to Dylan Ward, Kathleen Voelker, Esq., David Schertler, Esq., Tom Connolly, Esq. cc: Victor Zaborsky re: attorney/client communications	JDP
2285	7/20/07	11:50 AM	Joe Price to Dylan Ward re: attorney/client communication	JDP
2286-87	7/20/07	12:02 PM	Joe Price to David Schertler, Esq. and Kathleen Voelker, Esq. cc: Victor Zaborsky re: attorney/client communication	JDP
2288-89	7/20/07	12:08 PM	Joe Price to David Schertler, Esq. and Kathleen Voelker, Esq. cc: Dylan Ward re: attorney/client communication	JDP
2290-91	7/20/07	12:17 PM	Joe Price to David Schertler, Esq. and Kathleen Voelker, Esq. cc: Dylan Ward re: attorney/client communication	JDP
2292	7/20/07	12:24 PM	Joe Price to David Schertler, Esq. and Kathleen Voelker, Esq. cc: Dylan Ward re: attorney/client communication	JPD
2293	7/20/07	12:34 PM	Joe Price to Kathleen Voelker, Esq., Dylan Ward and Victor Zaborsky re: attorney/client communication	JPD
2294-95	7/20/07	5:19 PM	Joe Price to David Schertler, Esq. and Dylan Ward cc: Kathleen Voelker, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communications	JDP
2296-97	7/23/07	10:39 AM	Joe Price to Dylan Ward relaying attorney client privilege information/communication	JDP.
2296R-97R	7/23/07	10:39 AM	Joe Price to Dylan Ward relaying attorney client privilege information/communication	JDP. Redacted.

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				Confidential.
2298-99	7/23/07	10:46 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Dylan Ward cc: Victor Zaborsky and Tom Connolly, Esq. re: attorney/client communications	JDP
2300-02	7/23/07	10:50 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Dylan Ward cc: Victor Zaborsky and Tom Connolly, Esq. re: attorney/client communications	JDP
2303	7/23/07	3:21 PM	Joe Price to Dylan Ward forwarding Dylan Ward attorney client communication and work product	JDP
2304-05	7/23/07 (2)	3:28 PM	Joe Price to Kathleen Voelker, Esq., David Schertler, Esq. and Tom Connolly, Esq. cc: Dylan Ward and Victor Zaborsky re: attorney/client communications	JDP
2306-07	7/23/07	3:31 PM	Joe Price to Dylan Ward forwarding Dylan Ward attorney client communication and work product	JDP
2308-11	7/23/07 (2)	3:38 PM	Joe Price to Dylan Ward forwarding Dylan Ward attorney client communication and work product	JDP
2312-15	7/23/07 (2)	3:46 PM	Joe Price to Kathleen Voelker, Esq., David Schertler, Esq., Tom Connolly, Esq., Dylan Ward and Victor Zaborsky re: attorney/client communications	JDP
2316	7/23/07 (2)	3:49 PM	Joe Price to Dylan Ward forwarding Dylan Ward attorney client privilege	JDP
2317	7/24/07 (2)	5:42 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq. and Tom Connolly, Esq. cc: Dylan Ward and Victor Zaborsky re: attorney/client communications	JDP
2318	7/24/07 (2)	5:51 PM	Joe Price to Dylan Ward, David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Victor Zaborsky re: attorney/client communications	JDP
2319-20	7/25/07 (2)	9:39 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Dylan Ward cc: Victor Zaborsky re: attorney/client communications	JDP
2321-22	7/25/07	10:36 AM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communication	Produced.
2323-24	7/26/07	11:45 AM	Joe Price to Dylan Ward, David Schertler, Esq., Kathleen Voelker, Esq., and Victor	JDP

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			Zaborsky re: attorney/client communications	
2325-27	7/26/07	12:04 PM	Joe Price to Dylan Ward, David Schertler, Esq., Kathleen Voelker, Esq. and Victor Zaborsky re: attorney/client communications	JDP
2328	7/26/07 (3)	12:31 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Victor Zaborsky, Tom Connolly, Esq. and Dylan Ward re: attorney/client communications	JDP
2329	7/26/07 (3)	12:35 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Victor Zaborsky, Tom Connolly, Esq. and Dylan Ward re: attorney/client communications	JDP
2330-31	7/26/07 (3)	12:58 PM	Joe Price to Dylan Ward, David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communications	JDP
2332-33	7/26/07 (2)	1:01 PM	Joe Price to Kathleen Voelker, Esq., David Schertler, Esq., Victor Zaborsky, Tom Connolly, Esq. and Dylan Ward re: attorney/client communications	JDP
2334-35	7/26/07 (2)	1:52 PM	Joe Price to Dylan Ward, David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communications	JDP
2336-37	7/26/07 (2)	1:56 PM	Joe Price to Dylan Ward and Victor Zaborsky re: attorney/client communication	JDP
2336R-37R	7/26/07 (2)	1:56 PM	Joe Price to Dylan Ward and Victor Zaborsky re: attorney/client communication	JDP Redacted.
2338-40	7/26/07 (2)	2:40 PM	Joe Price to Dylan Ward, David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communications	JDP
2341-44	7/26/07 (2)	4:26 PM	Joe Price to Dylan Ward, David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communications	JDP
2345-48	7/29/07 (2)	4:48 PM	Joe Price to Dylan Ward, David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communications	JDP
2349-53	7/30/07 (2)	9:49 AM	Joe Price to Dylan Ward, David Schertler, Esq., Kathleen Voelker, Esq., Tom	JDP

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			Connolly, Esq. and Victor Zaborsky re: attorney/client communications	
2354-55	8/5/07	2:19 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Dylan Ward and Victor Zaborsky re: attorney/client communications	JDP
2356-57	8/5/07 (2)	4:39 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Dylan Ward and Victor Zaborsky	JDP
2358-59	8/5/07 (2)	5:23 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Dylan Ward and Victor Zaborsky re: attorney/client communications	JDP
2360-62	8/5/07 (2)	6:44 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Dylan Ward and Victor Zaborsky re: attorney/client communications	JDP
2363	8/6/07	3:19 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Dylan Ward and Victor Zaborsky re: attorney/client communications	JDP
2364-65	8/6/07 (2)	3:48 PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Victor Zaborsky, Kathleen Voelker, Esq. and Dylan Ward re: attorney/client communications	JDP
2366-67	8/6/07 (2)	4:02 PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Victor Zaborsky, Kathleen Voelker, Esq. and Dylan Ward re: attorney/client communications	JDP
2368-69	8/7/07 (2)	4:01 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., Dylan Ward and Victor Zaborsky re: attorney/client communications	JPD
2370-71	8/7/07 (2)	4:06 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., Dylan Ward and Victor Zaborsky re: attorney/client communications	JPD
2372-74	8/7/07 (2)	4:45 PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Victor Zaborsky, Kathleen Voelker, Esq. and Dylan Ward re: attorney/client communications	JDP
2375-76	8/7/07 (2)	4:55 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., Dylan Ward and Victor Zaborsky re:	JPD

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			attorney/client communications	
2377-79	8/7/07 (2)	5:03 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq., Dylan Ward and Victor Zaborsky re: attorney/client communications	JPD
2380	8/19/07	10:51 PM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Dylan Ward and Victor Zaborsky re: attorney/client communications	JPD
2381	8/19/07 (2)	10:57 PM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communication	JPD
2382	8/21/07	2:44 PM	Joe Price to Kathleen Voelker, Esq., Danny Onorato, Esq., Dylan Ward re: attorney/client communications	JDP
2383	8/21/07	3:14	Joe Price to Kathleen Voelker, Esq., Danny Onorato, Esq., Dylan Ward re: attorney/client communications	JDP
2384-85	8/30/07	1:37 PM	Joe Price to Dylan Ward and Tom Connolly, Esq. cc: Kathleen Voelker, Esq. and Victor Zaborsky re: attorney/client communications	JDP
2386	9/24/07	8:47 AM	Joe Price to Dylan Ward, Victor Zaborsky, Tom Connolly, Esq., David Schertler, Esq. and Kathleen Voelker, Esq. re: attorney/client communications	JDP
2387	9/24/07	8:59 AM	Joe Price to Dylan Ward, Victor Zaborsky, Tom Connolly, Esq., David Schertler, Esq. and Kathleen Voelker, Esq. re: attorney/client communications	JDP
2388	9/24/07	10:14 AM	Joe Price to Dylan Ward, Victor Zaborsky, Tom Connolly, Esq., David Schertler, Esq. and Kathleen Voelker, Esq. re: attorney/client communications	JDP
2390-92	11/1/07	9:59 AM	Joe Price to David Schertler, Esq., Kathleen Voelker, Esq., Tom Connolly, Esq. cc: Dylan Ward and Victor Zaborsky re: attorney/client communications	JDP
1185	11/19/07	11:21 PM	Joe Price to Dylan Ward and Victor Zaborsky re: frustration	Confidential.
2393-94	3/7/08	12:10 PM	Joe Price to Dylan Ward re: attorney/client communication	JDP.
2393R-94R	3/7/08	12:10 PM	Joe Price to Dylan Ward re: attorney/client communication	JDP. Redacted.

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2395-96	7/6/08 (2)	2:09 PM	Joe Price to Dylan Ward re: investigation	Produced.
2397-98	7/6/08 (2)	2:55 PM	Joe Price to Dylan Ward re: investigation	Produced.
2399	7/10/08	7:15 AM	Joe Price to Dylan Ward re: investigation	Produced.
2400-05	7/23/08 (2)	1:04 PM	Joe Price to Dylan Ward cc: Victor Zaborsky forwarding Dylan Ward attorney/client communication/work product	JDP
2406	7/23/08	4:56 PM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communication/work product	Produced.
2407	7/23/08	7:44 PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Kathleen Voelker, Esq., Dylan Ward and Victor Zaborsky re: attorney/client communication	JDP
2408	7/28/08 (2)	5:32 AM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Kathleen Voelker, Esq. cc: Dylan Ward and Victor Zaborsky re: attorney/client communication	JDP
2409	7/29/08 (2)	8:08 AM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Kathleen Voelker, Esq. cc: Dylan Ward and Victor Zaborsky re: attorney/client communication	JDP
2410-12	7/29/08	8:45 AM	Joe Price to Dylan Ward re: attorney/client communication	JDP.
2410R-12R	7/29/08	8:45 AM	Joe Price to Dylan Ward re: attorney/client communication	JDP. Redacted.
2413-15	7/29/08	8:54 AM	Joe Price to Dylan Ward re: attorney/client communication	JDP.
2413R-15R	7/29/08	8:54 AM	Joe Price to Dylan Ward re: attorney/client communication	JDP. Redacted.
	7/29/08	5:21 PM	Joe Price to Tom Connolly, Esq., David Schertler, Esq., Kathleen Voelker, Esq. cc: Dylan Ward and Victor Zaborsky	
2416-17	7/29/08	5:21 PM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communication	JDP.
2416R-17R	7/29/08	5:21 PM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communication	JDP. Redacted.
2418-19	7/29/08	5:21 PM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communication	JDP.
2418R-19R	7/29/08	5:21 PM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communication	JDP. Redacted.
2420	7/29/08	5:21 PM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communication	JDP

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2421	7/30/08 (2)	12:41 PM	Joe Price to David Schertler, Esq., Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Robert Spagnoletti, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
2422-23	7/30/08 (2)	7:09 PM	Joe Price to David Schertler, Esq., Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Robert Spagnoletti, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
2424-25	7/31/08 (2)	9:56 AM	Joe Price to David Schertler, Esq., Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Robert Spagnoletti, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
2426-28	8/1/08 (3)	9:40 AM	Joe Price to David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
2429-32	8/1/08 (3)	1:23 PM	Joe Price to David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
2433-36	8/4/08 (3)	10:05 AM	Joe Price to David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
2437	8/4/08	11:47 AM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Kathleen Voelker, Esq., Dylan Ward and Zaboarsky re: attorney/client communication	JDP
2438 2440	8/4/08	5:36 PM	Joe Price to David Schertler, Esq., Tom Connolly, Esq., Kathleen Voelker, Esq., Dylan Ward and Zaboarsky re: attorney/client communication	JDP
2442-43	8/5/08 (2)	5:27 PM	Joe Price to Dylan Ward re: attorney/client communication	JDP.
2442R-43R	8/5/08 (2)	5:27 PM	Joe Price to Dylan Ward re: attorney/client communication	JDP. Redacted.
2444-45	8/6/08 (2)	9:27 AM	Joe Price to David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq., Tom	JDP

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			Connolly, Esq. and Victor Zaborsky re: attorney/client communication	
2446	8/8/08	4:28 PM	Joe Price to Dylan Ward forwarding Dylan Ward and re: attorney/client communication	JDP
2447-48	8/11/08	9:59 AM	Joe Price to Dylan Ward and Victor Zaborsky forwarding Dylan Ward attorney/client communication	JDP
2449-52	8/13/08 (2)	7:57 AM	Joe Price to David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
2453-54	8/15/08	4:26 PM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communication	JDP
2455-56	8/18/08 (2)	6:52 AM	Joe Price to David Schertler, Esq., Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Robert Spagnoletti, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
2457-59	8/21/08 (2)	10:42 AM	Joe Price to Tom Connolly, Esq., David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq., and Victor Zaborsky re: attorney/client communication	JDP
2460-62	8/28/08	3:38 (3:39) PM	Joe Price to Dylan Ward forwarding Dylan Ward and re: attorney/client communication	JDP
2463	9/15/08 (2)	10:19 AM	Joe Price to Dylan Ward forwarding Dylan Ward and re: attorney/client communication	JDP
2464	9/15/08	6:02 PM	Joe Price to David Schertler, Esq. and Dylan Ward cc: Victor Zaborsky re: attorney/client communication	JDP
2465	10/29/08 (2)	9:51 (9:52) AM	Joe Price to David Schertler, Esq., Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Spagnoletti, Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
2466	10/30/08 (2)	6:48 AM	Joe Price to David Schertler, Esq., Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Robert Spagnoletti, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client	JDP

**PRIVILEGE LOG – ARENT FOX DISCS 6 & 7
(AMENDED FOR PRODUCTION ON 7/15/10)
(From Files Entitled “Dylan Dylan Ward,” DylanDylan Ward” and “SavorMessage01”)
Civil Action No. 0008315-08**

			communication	
2467-68	10/30/08 (2)	3:58 (3:59) PM	David Schertler, Esq. to Joe Price, Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Robert Spagnoletti, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
2469-72	10/30/08 (2)	5:31 (5:34) PM	Victor Zaborsky to David Schertler, Esq., Danny Onorato, Esq., Tom Connolly, Esq. cc: Kathleen Voelker, Esq., Joe Price, Dylan Ward, Michael Starr, Esq. and Robert Spagnoletti, Esq. re: attorney/client communication	JDP
2473-75	10/31/08 (2)	8:15 (8:16) AM	David Schertler, Esq. to Joe Price Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Spangnoletti, Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
2476-78	10/31/08 (2)	8:19 AM	Joe Price to David Schertler, Esq., Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Spangnoletti, Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
2479-81	10/31/08 (2)	8:21 AM	Joe Price to David Schertler, Esq., Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Spangnoletti, Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
2482-85	10/31/08 (2)	8:24 AM	Joe Price to David Schertler, Esq., Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Spangnoletti, Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
2486-89	10/31/08 (2)	8:44 (8:45) AM	David Schertler, Esq. to Joe Price, Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Spangnoletti, Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
2490-93	10/31/08	9:49 (9:48)	David Schertler, Esq. to Joe Price, Danny	JDP

PRIVILEGE LOG – ARENT FOX DISCS 6 & 7
(AMENDED FOR PRODUCTION ON 7/15/10)
(From Files Entitled “Dylan Dylan Ward,” DylanDylan Ward” and “SavorMassage01”)
Civil Action No. 0008315-08

	(2)	AM	Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Spangnoletti, Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	
2494-97	10/31/08 (2)	9:50 (9:49) AM	Joe Price to David Schertler, Esq., Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Spangnoletti, Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
2498-2500	10/31/08 (2)	9:51 (9:52) AM	Tom Connolly, Esq. to Joe Price to David Schertler, Esq., Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Spangnoletti, and Victor Zaborsky re: attorney/client communication	JDP
2501-04	10/31/08 (2)	10:47 AM	Danny Onorato, Esq. to Joe Price to David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Spangnoletti, Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
2505	10/31/08 (2)	11:37 (11:39) AM	Victor Zaborsky to Danny Onorato, Esq., Tom Connolly, Esq., Joe Price, David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq. and Robert Spangnoletti, Esq. re: attorney/client communication	JDP
2510-14	10/31/08 (2)	11:40 (11:39) AM	Joe Price to David Schertler, Esq., Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Spangnoletti, Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
2515-19	10/31/08 (2)	11:46 (11:45) AM	David Schertler, Esq. to Victor Zaborsky, Joe Price, Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Spangnoletti, Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
2520-24	10/31/08 (2)	11:47 (11:48) AM	Joe Price to David Schertler, Esq., Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Robert	JDP

**PRIVILEGE LOG -- ARENT FOX DISCS 6 & 7
(AMENDED FOR PRODUCTION ON 7/15/10)
(From Files Entitled "Dylan Dylan Ward," DylanDylan Ward" and "SavorMassage01")
Civil Action No. 0008315-08**

			Spagnoletti, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	
2525-29	10/31/08 (2)	11:49 (11:50) AM	Tom Connolly, Esq. to Joe Price , David Schertler, Esq., Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Robert Spagnoletti, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
2530-35	10/31/08 (2)	11:50 (11:51) AM	Danny Onorato, Esq. to Joe Price, David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Robert Spagnoletti, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
2536-41	10/31/08 (2)	11:54 (11:55) AM	Victor Zaborsky to Danny Onorato, Esq., Joe Price, David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Spagnolett, Tom Connolly, Esq. re: attorney/client communication	JDP
2542-47	10/31/08 (2)	12:28 (12:29) PM	Danny Onorato, Esq. to Joe Price, David Schertler, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Robert Spagnoletti, Esq., Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
2548-53	10/31/08 (2)	12:32 PM	Joe Price to David Schertler, Esq., Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Spagnoletti, Tom Connolly, Esq. and Victor Zaborsky re: attorney/client communication	JDP
2554-60	10/31/08 (2)	12:35 PM	Kathleen Voelker, Esq. to Joe Price, Danny Onorato, Esq., Victor Zaborsky, Tom Connolly, Esq., David Schertler, Esq., Michael Starr, Esq. and Robert Spagnoletti, Esq. re: attorney/client communication	JDP
2561-69	10/31/08 (2)	1:54 PM	Kathleen Voelker, Esq. to David Schertler, Esq., Danny Onorato, Esq., Joe Price, Victor Zaborsky, Tom Connolly, Esq., Dylan Ward, Michael Starr, Esq. and Robert Spagnoletti, Esq. re: attorney/client communication	JDP

PRIVILEGE LOG – ARENT FOX DISCS 6 & 7
(AMENDED FOR PRODUCTION ON 7/15/10)
(From Files Entitled “Dylan Dylan Ward,” DylanDylan Ward” and “SavorMassage01”)
Civil Action No. 0008315-08

2570	11/3/08	9:32 AM	Joe Price to David Schertler, Esq., Bernard Grimm, Esq., Danny Onorato, Esq., Dylan Ward, Kathleen Voelker, Esq., Michael Starr, Esq., Robert Spagnoletti, Esq., Tom Connolly, Esq., Jennings, Victor Zaborsky re: attorney/client communication	JDP
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PRIVILEGE LOG – ARENT FOX DISCS 6 & 7
(AMENDED FOR PRODUCTION ON 7/15/10)
(From Files Entitled “Dylan Dylan Ward,” DylanDylan Ward” and “SavorMessage01”)
Civil Action No. 0008315-08

“SavorMassage01.pst” Folder: (Disc 7)

Bates #	Date	Time	Parties	Privilege
2571-75	11/29/07 (2)	5:44 PM	Joe Price to Dylan Ward re: investigation	Confidential.
2576-77	3/7/08	12:10 PM	Joe Price to Dylan Ward re: attorney/client meeting	JDP.
2576R- 77R	3/7/08	12:10 PM	Joe Price to Dylan Ward re: attorney/client meeting	JDP. Redacted.

ND: 4822-5229-2103, v. 1

Exhibit 13

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
Civil Division

Estate of ROBERT E. WONE, by
KATHERINE E. WONE,

Plaintiff,

v.

JOSEPH R. PRICE,

VICTOR ZABORSKY,

and

DYLAN WARD,

Defendants

Civil Action No. 0008315-08

The Honorable Brook Hedge

Next Event: Initial Conference

February 27, 2009

PRIVILEGE LOG RE: CATEGORY TWO OF JANUARY 9, 2009 SUBPOENA TO ARENT FOX LLP

<u>Date</u>	<u>Time</u>	<u>To</u>	<u>From</u>	<u>CC's</u>	<u>Description</u>	<u>Basis of Privilege</u>
					Deleted Items	
8/28/06	9:54 am	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
8/28/06	11:51 am	Joseph Price	Victor Zaborsky		Email Correspondence	Registered Domestic Partner Communication
8/28/06	2:23 pm	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner

<u>Date</u>	<u>Time</u>	<u>To</u>	<u>From</u>	<u>CC's</u>	<u>Description</u>	<u>Basis of Privilege</u>
8/30/06	8:45(4) am	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
8/30/06	8:45(4) am	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
8/30/06	12:01 pm	Joseph Price	Victor Zaborsky		Email Correspondence	Registered Domestic Partner Communication
8/30/06	12:06 pm	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
8/30/06	12:06 pm	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
9/05/06	11:04am	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
					InBox	
8/21/06	8:50 am	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
8/21/06	9:16 am	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
8/21/06	9:52(49) am	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication

¹ Occasionally the "Received" time indicated in the Outlook folder where the message is located is slightly different from the time the message itself indicates it was sent, in which case the difference is indicated in parenthesis following the indicated time of receipt. For example a message may appear in the Outlook folder as received at 8:45am but when the message is opened, it shows it was sent at 8:44am. This is reflected in the log as 8:45(4) am.
ND: 4822-8220-2115, v. 1

<u>Date</u>	<u>Time</u>	<u>To</u>	<u>From</u>	<u>CC's</u>	<u>Description</u>	<u>Basis of Privilege</u>
9/05/06	9:50 am	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
9/05/06	9:53 am	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
9/05/06	10:08 am	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
					Sent Items	
6/05/06	1:37 pm	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
6/05/06	2:58 pm	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
6/06/06	12:10 pm	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
6/07/06	2:46 pm	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
6/13/06	4:53 pm	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
6/26/06	3:14 pm	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
7/09/06	3:43 pm	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
7/09/06	4:05 pm	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication

<u>Date</u>	<u>Time</u>	<u>To</u>	<u>From</u>	<u>CC's</u>	<u>Description</u>	<u>Basis of Privilege</u>
						Partner Communication
7/09/06	4:20 pm	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
7/10/06	4:54 pm	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
7/10/06	4:56 pm	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
7/11/06	9:46 am	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
7/14/06	1:20 pm	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
7/25/06	9:03 am	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
7/25/06	9:24 am	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
7/31/06	2:54 pm	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
9/05/06	9:57 am	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
9/05/06	10:17 am	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
9/05/06	11:01 am	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication

<u>Date</u>	<u>Time</u>	<u>To</u>	<u>From</u>	<u>CC's</u>	<u>Description</u>	<u>Basis of Privilege</u>
						Partner Communication

/s/ Craig D. Roswell
 Craig D. Roswell (DC Bar # 433406)
 Niles, Barton & Wilmer, LLP
 111 S. Calvert Street, Suite 1400
 Baltimore, Maryland 21202
 (410) 783-6341
 (410) 783-6486 (facsimile)
cdroswell@nilesbarton.com

Counsel for Defendant Joseph Price

Exhibit 14

NILES BARTON & WILMER LLP

Trusted Legal Advisors Since 1838.

Brett A. Buckwalter • Partner

Direct Dial (410) 783 - 6385

Fax (410) 783 - 6445

babuckwalter@nilesbarton.com

Admitted to practice in Maryland & District of Columbia

August 16, 2010

Via E-mail and Regular Mail

Daniel Suleiman, Esquire
Covington & Burling LLP
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

RE: *Estate of Wone v. Price, et al.*
Superior Court for the District of Columbia
Case No.: 2008-cv-008315 B
Our File No.: 49704

Dear Dan:

Please allow this letter to serve as a response to your August 6, 2010 e-mail regarding the Arent Fox documents. Again, thank you for allowing us until today to respond. We have reviewed the Arent Fox privilege log, and it appears as though privilege does not apply to a small number of the documents contained in the log.

As to e-mails between Messrs. Price, Ward, and/or Zaborsky that do not contain counsel: We do not agree with your global position that any communication that does not have at least one attorney on it cannot be subject to the joint defense privilege. All three defendants are parties to the agreement, and Mr. Price is an attorney who was actively participating in the joint defense. Accordingly, Mr. Price will continue to assert the joint defense privilege with regard to e-mails between them that discuss the joint defense strategy and/or substantive communications with joint defense counsel. Notwithstanding, there are some e-mails that do not discuss the criminal matter at all or only discuss it in a manner unrelated to the joint defense. We will no longer be asserting the joint defense privilege as to these documents and will be removing them from the privilege log. Regarding e-mails between only Mr. Price and Mr. Zaborsky, all such e-mails are protected by the marital communications privilege.

Daniel Suleiman, Esquire
August 16, 2010
Page 2

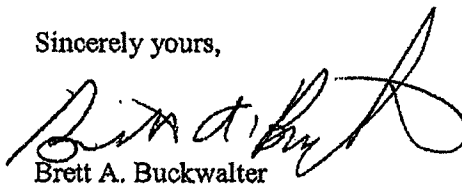
With respect to e-mails from Mr. Price to himself, these e-mails are protected by the attorney-work product doctrine. Mr. Price was an attorney participating in the joint defense. As such his legal impressions and work product are privileged. There are no e-mails from Mr. Price to himself that substantively would not fall squarely within the privilege.

Regarding third parties, Laura Lester and Emily Thorne are or were attorneys at Arent Fox. Ms. Lester was made available by Arent Fox to Kathy Voelker for the express purpose of assisting her in representing Mr. Price, and Ms. Lester engaged Ms. Thorne to assist her. Accordingly, substantive e-mails between them and Mr. Price are protected by the attorney-client and joint defense privileges. There are some e-mails between Mr. Price and Ms. Lester that are personal in nature, which will be removed from the privilege log. Kim Hibbert was Mr. Price's secretary. The only e-mails with her involve Mr. Price providing instruction to her with regard to his work product. Therefore, the work product doctrine extends to these e-mails. Finally, Eric Glass was at one time the attorney for Michael Price and, during the course of his representation, Mr. Glass was party to the joint defense agreement. I have confirmed this with other criminal counsel.

Enclosed is the bate-stamped privilege logs. By Wednesday, August 18, 2010, we will forward you revised logs noting which documents have been removed from the privilege log, and the documents themselves. All documents removed from the privilege log and produced are being produced as confidential and subject to the "Stipulated Confidentiality Agreement and Protective Order Regarding Production by Arent Fox, LLP.

I trust that this letter is responsive to your inquiry. If you would like to discuss this matter further, please do not hesitate to contact us.

Sincerely yours,



Brett A. Buckwalter

BAB/nsa
Enclosures

cc: (via e-mail only)

Craig D. Roswell, Esquire
Robert J. Spagnoletti, Esquire
David Schertler, Esquire
Ralph Spooner, Esquire
Frank Daily, Esquire
Sean Edwards, Esquire

Exhibit 15

**EXCERPTS OF PRICE PRIVILEGE LOGS CONTAINING
COMMUNICATIONS BETWEEN DEFENDANTS FROM JUNE -
NOVEMBER 2006**

PRIVILEGE LOG - ARENT FOX DISC 5
(AMENDED FOR PRODUCTION ON 7/15/10)
(From Files Entitled "Rob, Robert, and Wone")
Civil Action No. 0008315-08

Emails between J. Price and V. Zaborsky Only

Bate's #	Date	Time	Parties	Privilege
A/F 00087- 00089	9/13/06 (2)	5:01 PM	Joe Price to Victor Zaborsky re: wedding photos	SP
A/F 00090- 00092	9/13/06 (4)	5:05 PM	Joe Price to Victor Zaborsky re: wedding photos	SP
A/F 00093- 00096	9/13/06 (2)	5:07 PM	Joe Price to Victor Zaborsky re: wedding photos	SP

Emails Between J. Price and D. Ward or between J. Price, D. Ward, and V. Zaborsky

Bate's #	Date	Time	Parties	Privilege
A/F 00052- 00053	8/16/06 (2)	8:35 AM	Joe Price to Joe Price attaching attorney work product	AWP
A/F 00754	8/15/06	10:48 PM	Dylan Ward to Joe Price cc: Victor Zaborsky re: attorney meeting with David Schertler	JDP

PRIVILEGE LOG - ARENT FOX DISCS 6 & 7
(AMENDED FOR PRODUCTION ON 7/15/10)
(From Files Entitled "Dylan Dylan Ward," "DylanDylan Ward" and "SavorMessage01")
Civil Action No. 0008315-08

Emails Between J. Price and D. Ward or between J. Price, D. Ward, and V. Zaborsky

Bates #	Date	Time	Parties/Description	Privilege
1193	11/2/06	4:13PM	Joe Price to Dylan Ward re: meeting with their attorneys	JDP
1206-08	11/7/06	1:41 PM	Joe Price to Dylan Ward re: investigation and forwarding attorney client communication	JDP
2075-77	8/9/06 (2)	4:28 PM	Joe Price to Dylan Ward re: attorney/client communication	JDP

2081-82	8/15/06 (2)	10:48 PM	Joe Price to Dylan Ward cc: Victor Zaborsky forwarding Dylan Ward attorney client communication/work product	JDP AWP
2083	10/5/06	3:53 PM	Joe Price to Dylan Ward and Victor Zaborsky re: attorney/client meeting	JDP
2114-16	11/7/06	1:41 PM	Joe Price to Dylan Ward forwarding Dylan Ward attorney/client communication	JDP

PRIVILEGE LOG RE: CATEGORY TWO OF JANUARY 9, 2009 SUBPOENA TO ARENT FOX LLP

<u>Date</u>	<u>Time</u>	<u>To</u>	<u>From</u>	<u>CC's</u>	<u>Description</u>	<u>Basis of Privilege</u>
					Deleted Items	
8/28/06	9:54 am	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
8/28/06	11:51 am	Joseph Price	Victor Zaborsky		Email Correspondence	Registered Domestic Partner Communication
8/28/06	2:23 pm	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
8/30/06	8:45(4) am	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
8/30/06	8:45(4) am	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
8/30/06	12:01 pm	Joseph Price	Victor Zaborsky		Email Correspondence	Registered Domestic Partner Communication
8/30/06	12:06 pm	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
8/30/06	12:06 pm	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
9/05/06	11:04am	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication

8/21/06	8:50 am	Victor Zaborsky	Joseph Price			InBox	Registered Domestic Partner Communication
8/21/06	9:16 am	Victor Zaborsky	Joseph Price			Email Correspondence	Registered Domestic Partner Communication
8/21/06	9:52(49) am	Victor Zaborsky	Joseph Price			Email Correspondence	Registered Domestic Partner Communication
9/05/06	9:50 am	Victor Zaborsky	Joseph Price			Email Correspondence	Registered Domestic Partner Communication
9/05/06	9:53 am	Victor Zaborsky	Joseph Price			Email Correspondence	Registered Domestic Partner Communication
9/05/06	10:08 am	Victor Zaborsky	Joseph Price			Email Correspondence	Registered Domestic Partner Communication
						Sent Items	
6/05/06	1:37 pm	Victor Zaborsky	Joseph Price			Email Correspondence	Registered Domestic Partner Communication
6/05/06	2:58 pm	Victor Zaborsky	Joseph Price			Email Correspondence	Registered Domestic Partner Communication
6/06/06	12:10 pm	Victor Zaborsky	Joseph Price			Email Correspondence	Registered Domestic Partner Communication
6/07/06	2:46 pm	Victor Zaborsky	Joseph Price			Email Correspondence	Registered Domestic Partner Communication

6/13/06	4:53 pm	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
6/26/06	3:14 pm	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
7/09/06	3:43 pm	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
7/09/06	4:05 pm	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
7/09/06	4:20 pm	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
7/10/06	4:54 pm	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
7/10/06	4:56 pm	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
7/11/06	9:46 am	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
7/14/06	1:20 pm	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
7/25/06	9:03 am	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication

7/25/06	9:24 am	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
7/31/06	2:54 pm	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
9/05/06	9:57 am	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
9/05/06	10:17 am	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication
9/05/06	11:01 am	Victor Zaborsky	Joseph Price		Email Correspondence	Registered Domestic Partner Communication

Exhibit 16

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
Civil Division

**Estate of ROBERT E. WONE, by
KATHERINE E. WONE,**

Plaintiff,

v.

JOSEPH R. PRICE,

VICTOR ZABORSKY,

and

DYLAN WARD,

Defendants

**Civil Action No. 0008315-08
The Honorable Brook Hedge
Next Event: Status Hearing
September 10, 2010**

ANSWERS TO INTERROGATORIES

**TO: Estate of Robert E. Wone, by Katherine E. Wone, as Personal Representatives,
Plaintiff**

FROM: Joseph R. Price, Defendant

Joseph R. Price, Defendant, with the assistance of undersigned counsel, in answer to Plaintiff's Interrogatories states as follows:

A. The information supplied in these answers is not based solely on the knowledge of the executing party, but includes knowledge of the party, its agents, representatives and attorneys, unless privileged.

B. The word usage and sentence structure may be that of the attorney assisting in the preparation of these answers and, thus, does not necessarily purport to be the precise language of the executing party.

C. The information contained in these answers is being provided in accordance with the provisions and intent of District of Columbia Rules of Civil Procedure which required the disclosure of the facts which may be relevant or which may lead to the discovery of relevant information. Accordingly, the party answering these interrogatories, by providing the information requested, does not waive objections to its admission in evidence on the grounds of materiality or relevancy or other proper grounds for objection.

D. These interrogatories have been interpreted and answered in accordance with the Rules of Procedure and plain English usage. To the extent the definitions and instructions included with the interrogatories are inconsistent therewith, this party disavows any intention to abide by them.

Answers

INTERROGATORY NO. 1: State your current name, occupation, place of employment, telephone number(s), e-mail address(es), and physical address(es).

ANSWER: Joseph R. Price, attorney. Defendant will provide the Plaintiff with his physical address and telephone number upon the entry of a protective order or execution of a confidentiality agreement protecting that information from third party disclosure.

INTERROGATORY NO. 2: Identify all persons who have knowledge of facts relevant to Plaintiff's claims or your defense(s) in this action and the nature, extent, and basis for their knowledge.

ANSWER: Upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 3: Identify all persons present at the 1509 Swann Street residence at any time on August 2, 2006. For each person present, state, in addition to personal identifying information, the time period during which they were in the residence on that day and their reason for being there.

ANSWER: Upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 4: Describe in detail the circumstances and events surrounding the murder of Robert Wone on the night of August 2, 2006, including but not limited to:

- (a) when Wone arrived at the 1509 Swann Street residence;
- (b) by what means of transportation he traveled to the 1509 Swann Street residence;
- (c) your interactions and discussions with Wone on the night of August 2, 2006;
- (d) how and when Wone was injured;
- (e) how and when you came to know that Wone was injured;
- (f) the specific location of Wone within the house, and the position of his body, when you first saw him in an injured condition; and
- (g) the actions you took upon finding Wone in an injured condition, including, without limitation, any steps that you took to assist him or summon help.

ANSWER: Upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 5: Describe in detail any and all bases for your contention that an "intruder" murdered Robert Wone.

ANSWER: Upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 6: Describe in detail your activities on the night of August 2, 2006, including, without limitation, when you first saw Robert Wone and what you were doing from the time that you first saw Wone on that night until the time that 9-1-1 was called at 11:49 p.m.

ANSWER: Upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 7: State whether you attempted to stanch Robert Wone's bleeding by using towel(s), cloth(s), or other item(s) to apply pressure to his wounds. If so, describe why no blood-soaked towel(s), cloth(s), or other item(s) were found by police at the 1509 Swann Street residence following the murder.

ANSWER: Upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 8: State whether you made any telephone calls between the time on August 2, 2006 when you first discovered Robert Wone in an injured condition or learned that Wone was injured and the time that EMS technicians arrived at the 1509 Swann Street residence. If so, identify each and every person with whom you spoke by telephone during this period and describe the sum and substance of the conversation(s).

ANSWER: Upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 9: Identify by telephone number, service provider, and account number any cellular telephones, blackberries, pagers, or other electronic communication devices used by you on or about August 2, 2006.

ANSWER: Upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 10: Identify each and every person with whom you have discussed Robert Wone's murder or any of the events or activities involving Wone that occurred on August 2, 2006. For each person identified, state the approximate date of your discussion and describe the sum and substance of the conversation.

ANSWER: Objection. This Interrogatory, at least in part, seeks identification of privileged attorney work product, communications made in anticipation of litigation, and communications protected by the attorney-client, joint defense and spousal communication privileges. This Interrogatory is additionally over broad and unduly burdensome in purporting to call for the production of information on a vast number of communications.

Without waiving and limited by said objection, upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 11: Describe in detail all physical contacts you or any other person(s) had with Robert Wone's body, either directly or indirectly, on the night of August 2, 2006, including, without limitation:

(a) whether and how you or any other person(s) injected any drugs, medications, or foreign substance into, or in any way caused the introduction of drugs, medications, or foreign substances into Wone's body;

(b) whether and how you or any other person(s) physically or sexually assaulted Wone;

(c) whether and how you or any other person(s) stabbed Wone.

ANSWER: Objection. This Interrogatory, specifically subsections (a) and (b), seeks information that is irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, and is meant to serve no other purpose than to embarrass, humiliate, and disparage Defendant. Specifically, there is no evidentiary basis upon which Plaintiff can, in good faith and with substantial justification, make such an assertion that Robert Wone was either injected with a foreign substance or sexually assaulted.

Without waiving and limited by said objection, upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 12: Describe in detail any actions taken by you or any other individual(s) to clean-up, shower, bathe, or wash Robert Wone's body after he was found in an injured condition on the night of August 2, 2006.

ANSWER: Objection. This Interrogatory seeks information that is irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, and is meant to serve no other purpose than to embarrass, humiliate, and disparage Defendant. Specifically, there is no

evidentiary basis upon which Plaintiff can, in good faith and with substantial justification, make such an assertion that Robert Wone's body was cleaned up, showered, bathed, or washed after he was stabbed.

Without waiving and limited by said objection, upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 13: Describe in detail any actions taken by you or any other individual(s) to clean-up or re-arrange the 1509 Swann Street residence after Robert Wone was found in an injured condition on the night of August 2, 2006, including, without limitation, any efforts to move Wone's body; to wash clothing, bedding, your body or anyone else's body or other items; and/or to dispose of or discard a knife, clothing, or any other items.

ANSWER: Objection. This Interrogatory seeks information that is irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, and is meant to serve no other purpose than to embarrass, humiliate, and disparage Defendant. Specifically, there is no evidentiary basis upon which Plaintiff can, in good faith and with substantial justification, make an assertion that to there was any effort to clean-up or re-arrange the 1509 Swan Street residence after Robert Wone was found in an injured condition, or that any efforts were undertaken to move Wone's body, to wash clothing, bedding, or any other person, and/or to dispose of or discard a knife, clothing, or any other items.

Without waiving and limited by said objection, upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 14: Describe in detail any and all communications, whether in person, by telephone, electronic mail, text message, or otherwise, between you and Michael Price at any time from March 2006 through December 2006. For each such communication, provide at least the date of the communication, the identity of all persons party to the communication, and the sum and substance of the communication.

ANSWER: Objection. This Interrogatory seeks information that is irrelevant and/or not reasonably calculated to lead to the discovery of admissible evidence. This Interrogatory is further objectionable in that it is overbroad and unduly burdensome in scope and time, in that it calls for detailed information on each and every communication between two brothers over a period of ten months. This Interrogatory lacks appropriate subject-matter limitations and temporal limitations.

Without waiving and limited by said objection, upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 15: Identify the vendor or service provider responsible for the automated alarm system available for use at the 1509 Swann Street residence on the night of August 2, 2006.

ANSWER: Upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 16: State whether, from the time that you moved into the 1509 Swann Street residence until August 2, 2006, an intruder, burglar, or other unauthorized person had ever entered the residence. If so, identify the intruder(s), burglar(s), or unauthorized entrant(s) and describe the circumstances surrounding each such incident.

ANSWER: Objection. This Interrogatory seeks information that is irrelevant and/or not reasonably calculated to lead to the discovery of admissible evidence.

Without waiving and limited by said objection, upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 17: State whether you consumed alcohol, illegal drugs, prescriptions medications (whether you had a valid prescription or not), within 48 hours before or after Robert Wone's murder the night of August 2, 2006. If so, identify the name of the substance consumed, the amount consumed, and your reason for consuming it.

ANSWER: Objection. This Interrogatory seeks information that is irrelevant and/or not reasonably calculated to lead to the discovery of admissible evidence. This Interrogatory is further objectionable in that it does not have reasonable temporal limitations.

Without waiving and limited by said objection, upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 18: State whether you have ever injected any medication, drugs, or foreign substances into another person. If so, for each such instance, state the name of the person whom you injected, the name of the medication, drug, or substance that was injected, and the reason for doing so.

ANSWER: Objection. This Interrogatory, specifically subsections (a) and (b), seeks information that is irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, and is meant to serve no other purpose than to embarrass, humiliate, and disparage Defendant. Specifically, there is no evidentiary basis upon which Plaintiff can, in good faith and with substantial justification, make such an assertion that Robert Wone was injected with a foreign substance.

Without waiving and limited by said objection, upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 19: Describe in detail your relationship with Robert Wone, including, without limitation, when you first met Wone and the nature of the relationship, if any, between the two of you.

ANSWER: Upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 20: Describe and identify all of your assets or liabilities valued in excess of \$5,000, including, without limitation, real property, personal property, securities, mutual funds, cash, and/or insurance policies.


ANSWER: Objection. This Interrogatory seeks information that is irrelevant and/or not reasonably calculated to lead to the discovery of admissible evidence. Specifically, Defendant's assets and liabilities have no bearing on the issues in the litigation, and discovery of such items is improper at this stage of the litigation.

Without waiving and limited by said objection, and to the limited extent that this Interrogatory requests information regarding insurance policies, Defendant Price had in effect on August 2, 2006 a homeowners insurance policy with State Farm Fire and Casualty Company, a copy of which is produced in response to Plaintiff's Requests for Production of Documents.

INTERROGATORY NO. 21: Describe in detail any sales, gifts, or transfers of assets valued in excess of \$5,000 made by you to any other person or entity since August 2, 2006. For each such transaction, identify the asset, the buyer, recipient, or transferee, the consideration provided, and the reason you entered into the transaction.

ANSWER: Objection. This Interrogatory seeks information that is irrelevant and/or not reasonably calculated to lead to the discovery of admissible evidence. Specifically, Defendant's assets and liabilities have no bearing on the issues in the litigation, and discovery of such items is improper at this stage of the litigation.

I HEREBY CERTIFY UNDER THE PENALTIES OF PERJURY, THAT
THE INFORMATION CONTAINED IN THE FOREGOING ANSWERS TO
INTERROGATORIES IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE,
INFORMATION AND BELIEF.


Joseph R. Price

DISTRICT OF COLUMBIA: § 8

This document was acknowledged before me on August 19, 2010, by Joseph R. Price.

[Notary Seal, if any]:



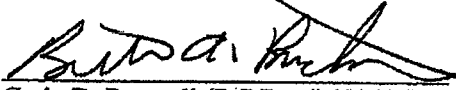

Notary Public

Notary Public for the District of Columbia

My commission expires: 10/31/2013

Melanie L. Radcliff
Notary Public, District of Columbia
My Commission Expires 10/31/2013

Respectfully submitted:



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Brett A. Buckwalter (DC Bar # 478382)
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Attorneys for Defendant Joseph Price

4851-2698-6503, v. 1

Exhibit 17

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Civil Division

**Estate of ROBERT E. WONE, by
KATHERINE E. WONE,**

Plaintiff,

v.

**JOSEPH R. PRICE,
VICTOR ZABORSKY, and
DYLAN WARD,**

Defendants.

Civil Action No. 0008315-08

The Honorable Brook Hedge

Status Hearing: September 10, 2010

**DEFENDANT, VICTOR ZABORSKY'S, ANSWERS
TO PLAINTIFF'S INTERROGATORIES**

Victor Zaborsky, Defendant, with the assistance of undersigned counsel, in answer to Plaintiff's Interrogatories states as follows:

A. The information supplied in these answers is not based solely on the knowledge of the executing party, but includes knowledge of the party, its agents, representatives and attorneys, unless privileged.

B. The word usage and sentence structure may be that of the attorney assisting in the preparation of these answers and, thus, does not necessarily purport to be the precise language of the executing party.

C. The information contained in these answers is being provided in accordance with the provisions and intent of District of Columbia Rules of Civil Procedure which require the disclosure of the facts which may be relevant or which may lead to the discovery of relevant information. Accordingly, the party answering these interrogatories, by providing the information requested, does not waive objections to its admission in evidence on the grounds of materiality or relevancy or other proper grounds for objection.

D. These interrogatories have been interpreted and answered in accordance with the Rules of Procedure and plain English usage. To the extent the definitions and instructions included with the interrogatories are inconsistent therewith, this party disavows any intention to abide by them.

PRELIMINARY OBJECTION

The U.S. Attorney has openly stated its intent to continue pursuing its criminal investigation against this Defendant, which could result in additional criminal charges being filed against Defendant Zaborsky. In light of this fact, Defendant Zaborsky must exercise his right under the Fifth Amendment to the Constitution of the United States to decline to answer these Interrogatories, as any substantive answer to these Interrogatories may jeopardize his right to assert his Fifth Amendment rights in the future.

ANSWERS TO INTERROGATORIES

INTERROGATORY NO. 1: State your current name, occupation, place of employment, telephone number(s), e-mail address(es), and physical address(es).

ANSWER NO. 1: Victor Zaborsky, Self-Employed Consultant. Defendant Zaborsky will provide the Plaintiff with his physical address and telephone number upon the entry of a protective order or execution of a confidentiality agreement protecting that information from third party disclosure.

INTERROGATORY NO. 2: Identify all persons who have knowledge of facts relevant to Plaintiff's claims or your defense(s) in this action and the nature, extent, and basis for their knowledge.

OBJECTION: This Interrogatory seeks in part information that may be protected by the attorney client privilege, the work product doctrine, and/or the spousal privilege.

ANSWER NO. 2: Upon advice of counsel, at this time Defendant Zaborsky exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 3: Identify all persons present at the 1509 Swann Street residence at any time on August 2, 2006. For each person present, state, in addition to personal identifying information, the time period during which they were in the residence on that day and their reason for being there.

ANSWER NO. 3: Upon advice of counsel, at this time Defendant Zaborsky exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 4: Describe in detail the circumstances and events surrounding the murder of Robert Wone on the night of August 2, 2006, including but not limited to:

- (a) when Wone arrived at the 1509 Swann Street residence;
- (b) by what means of transportation he traveled to the 1509 Swann Street residence;
- (c) your interactions and discussions with Wone on the night of August 2, 2006;
- (d) how and when Wone was injured;
- (e) how and when you came to know that Wone was injured;
- (f) the specific location of Wone within the house, and the position of his body, when you first saw him in an injured condition; and
- (g) the actions you took upon finding Wone in an injured condition, including, without limitation, any steps that you took to assist him or summon help.

ANSWER NO. 4: Upon advice of counsel, at this time Defendant Zaborsky exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 5: Describe in detail any and all bases for your contention that an "intruder" murdered Robert Wone.

ANSWER NO. 5: Upon advice of counsel, at this time Defendant Zaborsky exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 6: Describe in detail your activities on the night of August 2, 2006, including, without limitation, when you first saw Robert Wone and what you were doing from the time that you first saw Wone on that night until the time that 9-1-1 was called at 11:49 PM.

ANSWER NO. 6: Upon advice of counsel, at this time Defendant Zaborsky exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 7: State whether you attempted to stanch Robert Wone's bleeding by using towel(s), cloth(s), or other item(s) to apply pressure to his wounds. If so, describe why no blood-soaked towel(s), cloth(s), or other item(s) were found by police at the 1509 Swann Street residence following the murder.

ANSWER NO. 7: Upon advice of counsel, at this time Defendant Zaborsky exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 8: State whether you made any telephone calls between the time on August 2, 2006 when you first discovered Robert Wone in an injured condition or learned that Wone was injured and the time that EMS technicians arrived at the 1509 Swann Street residence. If so, identify each and every person with whom you spoke by telephone during this period and describe the sum and substance of the conversation(s).

ANSWER NO. 8: Upon advice of counsel, at this time Defendant Zaborsky exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 9: Identify by telephone number, service provider, and account number any cellular telephones, blackberries, pagers, or other electronic communication devices used by you on or about August 2, 2006.

ANSWER NO. 9: Upon advice of counsel, at this time Defendant Zaborsky exercises

his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 10: Identify each and every person with whom you have discussed Robert Wone's murder or any of the events or activities involving Wone that occurred on August 2, 2006. For each person identified, state the approximate date of your discussion and describe the sum and substance of the conversation.

OBJECTION: This Interrogatory, at least in part, seeks identification of privileged attorney work product, communications made in anticipation of litigation, and communications protected by the attorney-client, and joint defense communication privileges. This Interrogatory is additionally over broad and unduly burdensome in purporting to call for the production of information on a vast number of communications over a period of more than four years.

ANSWER NO. 10: Without waiving his objection, and upon advice of counsel Defendant Zaborsky at this time exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 11: Describe in detail all physical contacts you or any other person(s) had with Robert Wone's body, either directly or indirectly, on the night of August 2, 2006, including, without limitation:

- (a) whether and how you or any other person(s) injected any drugs, medications, or foreign substance into, or in any way caused the introduction of drugs, medications, or foreign substances into Wone's body;
- (b) whether and how you or any other person(s) physically or sexually assaulted Wone;
- (c) whether and how you or any other person(s) stabbed Wone.

OBJECTION: This Interrogatory, specifically subsections (a) and (b), seeks information that is neither relevant, nor reasonably calculated to lead to the discovery of relevant

or admissible evidence, and is meant to serve no other purpose than to embarrass, humiliate, and disparage Defendant. Specifically, there is no evidentiary basis upon which Plaintiff can, in good faith and with substantial justification, make such an assertion that Robert Wone was either injected with a foreign substance or sexually assaulted.

ANSWER NO. 11: Without waiving his objection, and upon advice of counsel, at this time Defendant Zaborsky exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 12: Describe in detail any actions taken by you or any other individual(s) to clean-up, shower, bathe, or wash Robert Wone's body after he was found in an injured condition on the night of August 2, 2006.

OBJECTION: This Interrogatory seeks information that is neither relevant, nor reasonably calculated to lead to the discovery of relevant or admissible evidence, and is meant to serve no other purpose than to embarrass, humiliate, and disparage Defendant. Specifically, there is no evidentiary basis upon which Plaintiff can, in good faith and with substantial justification, make such an assertion that Robert Wone's body was cleaned up, showered, bathed, or washed after he was stabbed.

ANSWER NO. 12: Without waiving his objection, and upon advice of counsel, at this time Defendant Zaborsky exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 13: Describe in detail any actions taken by you or any other individual(s) to clean-up or re-arrange the 1509 Swan Street residence after Robert Wone was found in an injured condition on the night of August 2, 2006, including, without limitation, any efforts to move Wone's body; to wash clothing, bedding, your body or anyone else's body or other items; and/or to dispose of or discard a knife, clothing, or any other items.

OBJECTION: This Interrogatory seeks information that is neither relevant, nor reasonably calculated to lead to the discovery of relevant or admissible evidence, and is meant to serve no other purpose than to embarrass, humiliate, and disparage Defendant. Specifically, there is no evidentiary basis upon which Plaintiff can, in good faith and with substantial justification, make an assertion that to there was any effort to clean-up or re-arrange the 1509 Swan Street residence after Robert Wone was found in an injured condition, or that any efforts were undertaken to move Wone's body, to wash clothing, bedding, or any other person, and/or to dispose of or discard a knife, clothing, or any other items.

ANSWER NO. 13: Without waiving his objection, and upon advice of counsel, at this time Defendant Zaborsky exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 14: Describe in detail any and all communications, whether in person, by telephone, electronic mail, text message, otherwise, between you and Michael Price at any time from March 2006 through December 2006. For each such communication, provide at least the date of the communication, the identity of all persons party to the communication, and the sum and substance of the communication.

ANSWER NO. 14: Upon advice of counsel, at this time Defendant Zaborsky exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 15: Identify the vendor or service provider responsible for the automated alarm system available for use at the 1509 Swann Street residence on the night of August 2, 2006.

ANSWER NO. 15: Upon advice of counsel, at this time Defendant Zaborsky exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 16: State whether, from the time that you moved into the 1509 Swann Street residence until August 2, 2006, an intruder, burglar, or other unauthorized person had ever entered the residence. If so, identify the intruder(s), burglar(s), or unauthorized entrant(s) and describe the circumstances surrounding each such incident.

ANSWER NO. 16: Upon advice of counsel, at this time Defendant Zaborsky exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 17: State whether you consumed alcohol, illegal drugs, prescriptions medications (whether you had a valid prescription or not), within 48 hours before or after Robert Wone's murder the night of August 2, 2006. If so, identify the name of the substance consumed, the amount consumed, and your reason for consuming it.

ANSWER NO. 17: Upon advice of counsel, at this time Defendant Zaborsky exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 18: State whether you have ever injected any medication, drugs, or foreign substances into another person. If so, for each such instance, state the name of the person whom you injected, the name of the medication, drug, or substance that was injected, and the reason for doing so.

OBJECTION: This Interrogatory seeks information that is neither relevant, nor reasonably calculated to lead to the discovery of relevant or admissible evidence, and is meant to serve no other purpose than to embarrass, humiliate, and disparage Defendant. Specifically, there is no evidentiary basis upon which Plaintiff can, in good faith and with substantial justification, make such an assertion that Robert Wone was injected with a foreign substance.

ANSWER NO. 18: Without waiving his objection, and upon advice of counsel, at this

time Defendant Zaborsky exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

INTERROGATORY NO. 19: Describe in detail your relationship with Robert Wone, including, without limitation, when you first met Wone and the nature of the relationship, if any, between the two of you.

ANSWER NO. 19: Upon advice of counsel, at this time Defendant Zaborsky exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

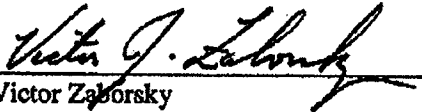
INTERROGATORY NO. 20: Describe and identify all of your assets or liabilities valued in excess of \$5,000, including, without limitation, real property, personal property, securities, mutual funds, cash, and/or insurance policies.

ANSWER NO. 20: This Interrogatory seeks information that is irrelevant and/or not reasonably calculated to lead to the discovery of admissible evidence. Specifically, Defendant's assets and liabilities have not bearing on the issues at litigation, and discovery of such items is improper at this stage of the litigation. Without waiving and limited by said objection, and to the limited extent that this Interrogatory requests information regarding insurance policies, Defendant Zaborsky states that he had in effect on August 2, 2006 a homeowners insurance policy with State Farm Fire and Casualty Company, a copy of which is being produced by Defendant Price in response to Plaintiff's Requests for Production of Documents.

INTERROGATORY NO. 21: Describe in detail any sales, gifts, or transfers of assets valued in excess of \$5,000 made by you to any other person or entity since August 2, 2006. For each such transaction, identify the asset, the buyer, recipient, or transferee, the consideration provided, and the reason you entered into the transaction.

ANSWER NO. 21: Objection. This Interrogatory seeks information that is irrelevant

I DO SOLEMNLY declare and affirm under the penalties of perjury that the contents of the foregoing Answers to Interrogatories are true and correct to the best of my knowledge, information, and belief.


Victor Zaborsky

Respectfully submitted,



Larissa N. Byers (D.C. Bar # 472431)
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Sean P. Edwards (*pro hac*)
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Counsel for Defendant Victor Zaborsky

CERTIFICATE OF SERVICE

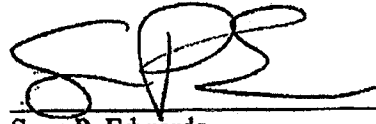
I HEREBY CERTIFY that on this 20th day of August, the following document was sent via First Class Mail, postage prepaid, and electronic transmission, to the following:

Benjamin J. Razi (brazi@cov.com)
Stephen W. Rodger (srodger@cov.com)
Daniel Suleiman (dsuleiman@cov.com)
Covington & Burling, LLP
1201 Pennsylvania Avenue, NW
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A handwritten signature in black ink, appearing to be 'SP Edwards', written over a horizontal line.

Sean P. Edwards

Exhibit 18

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Civil Division

**Estate of ROBERT E. WONE, by
KATHERINE E. WONE,**

Plaintiff,

v.

**JOSEPH R. PRICE,
VICTOR ZABORSKY, and
DYLAN WARD,**

Defendants.

Civil Action No. 0008315-08

The Honorable Brook Hedge

Status Hearing: September 10, 2010

**DEFENDANT DYLAN WARD'S ANSWERS TO
PLAINTIFF'S FIRST SET OF INTERROGATORIES**

Defendant Dylan Ward, with the assistance of undersigned counsel, in answer to Plaintiff's First Set of Interrogatories states as follows:

A. The information supplied in these answers is not based solely on the knowledge of the executing party, but includes knowledge of the party, its agents, representatives and attorneys, unless privileged.

B. The word usage and sentence structure may be that of the attorney assisting in the preparation of these answers and does not purport to be the precise language of the executing party.

C. The information contained in these answers is being provided in accordance with the provisions and intent of District of Columbia Rules of Civil Procedure which require the disclosure of the facts which may be relevant or which may lead to the discovery of relevant

information. Accordingly, the party answering these interrogatories, by providing the information requested, does not waive objections to its admission in evidence on the grounds of materiality or relevancy or other proper grounds for objection.

D. These interrogatories have been interpreted and answered in accordance with the Rules of Civil Procedure and plain English usage. To the extent the definitions and instructions included with the interrogatories are inconsistent therewith, this party disavows any intention to abide by them.

ANSWERS

INTERROGATORY NO. 1: State your current name, occupation, place of employment, telephone number(s), e-mail address(es), and physical address(es).

ANSWER: Dylan M. Ward, unemployed. Defendant Ward will provide the Plaintiff with his physical address, e-mail address, and telephone number upon the entry of a protective order or execution of a confidentiality agreement protecting that information from third party disclosure.

INTERROGATORY NO. 2: Identify all persons who have knowledge of facts relevant to Plaintiff's claims or your defense(s) in this action and the nature, extent, and basis for their knowledge.

ANSWER: Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

INTERROGATORY NO. 3: Identify all persons present at the 1509 Swann Street residence at any time on August 2, 2006. For each person present, state, in addition to personal identifying information, the time period during which they were in the residence on that day and their reason for being there.

ANSWER: Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

INTERROGATORY NO. 4: Describe in detail the circumstances and events surrounding the murder of Robert Wone on the night of August 2, 2006, including but not limited to:

- (a) when Wone arrived at the 1509 Swann Street residence;
- (b) by what means of transportation he traveled to the 1509 Swann Street residence;
- (c) your interactions and discussions with Wone on the night of August 2, 2006;
- (d) how and when Wone was injured;
- (e) how and when you came to know that Wone was injured;
- (f) the specific location of Wone within the house, and the position of his body, when you first saw him in an injured condition; and
- (g) the actions you took upon finding Wone in an injured condition, including, without limitation, any steps that you took to assist him or summon help.

ANSWER: Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

INTERROGATORY NO. 5: Describe in detail any and all bases for your contention that an "intruder" murdered Robert Wone.

ANSWER: Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

INTERROGATORY NO. 6: Describe in detail your activities on the night of August 2, 2006, including, without limitation, when you first saw Robert Wone and what you were doing from the time that you first saw Wone on that night until the time that 9-1-1 was called at 11:49 p.m.

ANSWER: Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

INTERROGATORY NO. 7: State whether you attempted to stanch Robert Wone's bleeding by using towel(s), cloth(s), or other item(s) to apply pressure to his wounds. If so, describe why no blood-soaked towel(s), cloth(s), or other item(s) were found by police at the 1509 Swann Street residence following the murder.

ANSWER: Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

INTERROGATORY NO. 8: State whether, on August 2, 2006, you possessed or owned the cutlery set that is pictured at Tab J of the Affidavit of Detective Bryan Waid, which was filed in D.C. Superior Court on or about October 27, 2008. If you did possess or own said cutlery set on that date, state:

- (a) when and from whom you first obtained the cutlery set;
- (b) the number of items in the cutlery set when you first obtained it;
- (c) why the cutlery set was kept in your bedroom;
- (d) whether the cutlery set or any part of it was used on August 2, 2006 for any purpose, including, without limitation, to stab Robert Wone;
- (e) the whereabouts of the smaller knife in the cutlery set on August 2, 2006;
- (f) the whereabouts of the smaller knife in the cutlery set on August 3, 2006; and
- (g) the whereabouts of the smaller knife in the cutlery set today.

ANSWER: Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

INTERROGATORY NO. 9: State whether you made any telephone calls between the time on August 2, 2006 when you first discovered Robert Wone in an injured condition or learned that Wone was injured and the time that EMS technicians arrived at the 1509 Swann Street residence. If so, identify each and every person with whom you spoke by telephone during this period and describe the sum and substance of the conversation(s).

ANSWER: Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

INTERROGATORY NO. 10: Identify by telephone number, service provider, and account number any cellular telephones, blackberries, pagers, or other electronic communication devices used by you on or about August 2, 2006.

ANSWER: Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

INTERROGATORY NO. 11: Identify each and every person with whom you have discussed Robert Wone's murder or any of the events or activities involving Wone that occurred on August 2, 2006. For each person identified, state the approximate date of your discussion and describe the sum and substance of the conversation.

ANSWER: Objection. This Interrogatory, at least in part, seeks identification of privileged attorney work product, communications made in anticipation of litigation, and communications protected by the attorney-client, and joint defense communication privileges. This Interrogatory is additionally over broad and unduly burdensome in purporting to call for the

production of information on a vast number of communications over a period of more than four years. Without waiving and limited by said objection, upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

INTERROGATORY NO. 12: Describe in detail all physical contacts you or any other person(s) had with Robert Wone's body, either directly or indirectly, on the night of August 2, 2006, including, without limitation:

- (a) whether and how you or any other person(s) injected any drugs, medications, or foreign substance into, or in any way caused the introduction of drugs, medications, or foreign substances into Wone's body;
- (b) whether and how you or any other person(s) physically or sexually assaulted Wone;
- (c) whether and how you or any other person(s) stabbed Wone.

ANSWER: Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

INTERROGATORY NO. 13: Describe in detail any actions taken by you or any other individual(s) to clean-up, shower, bathe, or wash Robert Wone's body after he was found in an injured condition on the night of August 2, 2006.

ANSWER: Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

INTERROGATORY NO. 14: Describe in detail any actions taken by you or any other individual(s) to clean-up or re-arrange the 1509 Swann Street residence after Robert Wone was found in an injured condition on the night of August 2, 2006, including, without limitation, any

efforts to move Wone's body; to wash clothing, bedding, your body or anyone else's body or other items; and/or to dispose of or discard a knife, clothing, or any other items.

ANSWER: Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

INTERROGATORY NO. 15: Describe in detail any and all communications, whether in person, by telephone, electronic mail, text message, or otherwise, between you and Michael Price at any time from March 2006 through December 2006. For each such communication, provide at least the date of the communication, the identity of all persons party to the communication, and the sum and substance of the communication.

ANSWER: Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

INTERROGATORY NO. 16: Identify the vendor or service provider responsible for the automated alarm system available for use at the 1509 Swann Street residence on the night of August 2, 2006.

ANSWER: Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

INTERROGATORY NO. 17: State whether, from the time that you moved into the 1509 Swann Street residence until August 2, 2006, an intruder, burglar, or other unauthorized person had ever entered the residence. If so, identify the intruder(s), burglar(s), or unauthorized entrant(s) and describe the circumstances surrounding each such incident.

ANSWER: Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

INTERROGATORY NO. 18: State whether you consumed alcohol, illegal drugs, prescriptions medications (whether you had a valid prescription or not), within 48 hours before or after Robert Wone's murder the night of August 2, 2006. If so, identify the name of the substance consumed, the amount consumed, and your reason for consuming it.

ANSWER: Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

INTERROGATORY NO. 19: State whether you have ever injected any medication, drugs, or foreign substances into another person. If so, for each such instance, state the name of the person whom you injected, the name of the medication, drug, or substance that was injected, and the reason for doing so.

ANSWER: Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

INTERROGATORY NO. 20: Describe in detail your relationship with Robert Wone, including, without limitation, when you first met Wone and the nature of the relationship, if any, between the two of you.

ANSWER: Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

INTERROGATORY NO. 21: Describe and identify all of your assets or liabilities valued in excess of \$5,000, including, without limitation, real property, personal property, securities, mutual funds, cash, and/or insurance policies.

ANSWER: Objection. This Interrogatory seeks information that is irrelevant and/or not reasonably calculated to lead to the discovery of admissible evidence. Specifically, Defendant's assets and liabilities have no bearing on the issues raised by Plaintiff's Complaint and discovery of such items is improper at this stage of the litigation. Without waiving and limited by said objection, and to the limited extent that this Interrogatory requests information regarding insurance policies, Defendant Ward has no such policy.

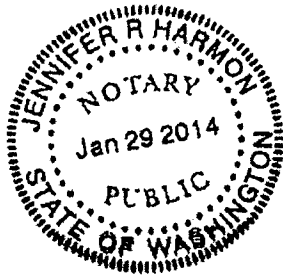
INTERROGATORY NO. 22: Describe in detail any sales, gifts, or transfers of assets valued in excess of \$5,000 made by you to any other person or entity since August 2, 2006. For each such transaction, identify the asset, the buyer, recipient, or transferee, the consideration provided, and the reason you entered into the transaction.

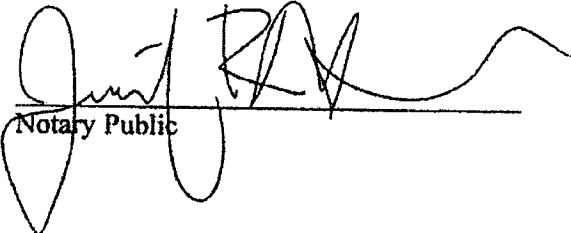
ANSWER: Objection. This Interrogatory seeks information that is irrelevant and/or not reasonably calculated to lead to the discovery of admissible evidence. Specifically, Defendant's assets and liabilities have no bearing on the issues raised by Plaintiff's Complaint and discovery of such items is improper at this stage of the litigation.

I hereby swear and affirm under the penalty of perjury that the above answers are true and correct to the best of my knowledge, understanding and belief.

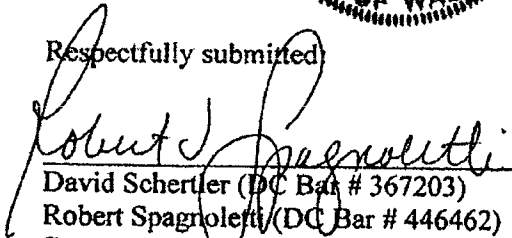

Dylan M. Ward

Sworn and subscribed before me on this 18 day of August, 2010.




Notary Public

Respectfully submitted,



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