

## SUMMARY OF DEFENDANTS' PRIVILEGE LOG AND DEFICIENCIES IN DEFENDANTS' OBJECTIONS

No.	Date	Description	Subject Matter	Attorney Client Privilege	Work Product	Joint Defense	Other	Deficiency of Defendants' Objection <sup>1</sup>
1.		All correspondence of any type between McCormack & Epstein and AIGDC and National Union related to the <u>Rhodes</u> matter	Defense Strategy	X	X			f.
2.	8/9/04	Mediation Memorandum of Defendant Building Materials Corp. of America d/b/a GAF Materials Corp.	N/A				X (Mediation)	Not subsection of current motion
3.		Handwritten Notes of Warren Nitti	Notes taken during trial of the <u>Rhodes</u> matter		X			d. f.
4.	5/13/04	Memorandum from Robert Toland, II, Esq., Campbell, Campbell, Edwards & Conroy, P.C. ("Campbell") to William J. Conroy, Esq., Campbell	Overview of Plaintiffs' claims against GAF as Zalewski's "statutory employer"	X	X			b. c. d.
5.	9/10/03	E-mail, with attachments, from J. Piantedo to Lawrence Boyle, Esq., Morrison, Mahoney & Miller	Jury verdict research	X	X	X		b. d. f.
6.		Facsimile from Mary Ann Scheneman, Corporate Litigation Examiner, Penske, to Melissa Tearney, Esq., Nixon Peabody LLP (attachments produced)	Correspondence regarding defense of Penske	X	X	X		b. d. f.
7.		Deposition Digest of Harold Rhodes	Deposition summary	X	X	X		Not subject of

<sup>1</sup> With the exception of Defendants' inappropriate general objections, addressed in *Plaintiffs' Memorandum in Support of Their Motion to Compel* Section A., pp. 4-6, the deficiencies of Defendants' objections will be summarized as follows:

- a. – No attorney named
- b. – Insufficient information regarding attorney-client relationship
- c. – No explanation of whether created in anticipation of litigation or ordinary course of business

- d. – Plaintiffs have substantial need for information unavailable elsewhere
- e. – Attorney-client privilege clearly not applicable
- f. – Insufficient information to determine validity (i.e. joint effort, disclosure to third party, etc.)

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								current motion
8.		Deposition Digest of Greg McDaniel	Deposition summary	X	X	X		Not subject of current motion
9.	5/27/04	Letter from William A. Rupert, Esq., Campbell, to Martin Maturine, Esq., AIG Technical Services, Inc. (attachments produced)	Discussion of Penske Business Auto insurance policy	X	X	X		b. d. e.
10.		All invoices for legal services and litigation expenses submitted by Campbell to AIGDC/National Union related to the <u>Rhodes</u> matter	N/A	X	X		X (Relevance)	b. d.
11.		All invoices for legal services and litigation expenses submitted by Harwood Lloyd, LLC (coverage counsel retained by AIGDC/National Union) to AIGDC/National Union related to the <u>Rhodes</u> matter	N/A	X	X		X (Relevance)	b. d. f.
12.	3/5/02	Excess Claim Note by James Joanos, AIGDC (with handwritten notes)	Liability and damages issues	X	X			a. b. c. d. f.
13.	5/23/03	Memorandum from Diane L. Scialabba, Esq., Campbell, to William J. Conroy, Esq., Campbell	Overview of liability and damages	X	X			b. c. d. f.
14.	5/23/03	E-mail correspondence from Diane L. Scialabba, Esq., Campbell, to Martin Maturine, AIGDC	Case status	X	X			b. c. d. f.

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No.	Date	Description	Subject Matter	Attorney Client Privilege	Work Product	Joint Defense	Other	Deficiency of Defendants' Objection <sup>1</sup>
15.	4/5/04	E-mail message from Richard Mastronardo, AIGDC, to Martin Maturine, AIGDC	Johnson & Dix matter (069-132015)				X (Relevance – unrelated matter)	Not subject of current motion
16.	11/7/03	E-mail from Gregory P. Deschenes, Esq., Nixon Peabody, LLP, to Kathleen Fuell, Zurich (copied to Jane Gordon, Esq., GAF and Johanna Mills, Crawford)	Forwarding Claim Evaluation Worksheet and Pre-Trial Report	X	X	X		b. d. f.
17.	11/14/03	E-mail from Stephen Penick, Crawford, to Kathleen Fuell, Zurich	Forwarding Claim Evaluation Worksheet and Pre-Trial Report		X	X		c. d.
18.	1/23/04	E-mail from Kathleen Fuell, Zurich, to Stephen Penick, Crawford	Reserves and claims handling strategy		X	X	X (Relevance)	c. d. f. (Clearly Relevant)
19.	2/11/04	E-mail from Stephen Penick, Crawford, to Kathleen Fuell, Zurich (copied to Nicholas Satriano, AIGDC and Fred Hohn, Willis Corroon)	Claims handling strategy		X	X		c. d. f.
20.	2/13/04	E-mail from Nicholas Satriano, AIGDC, to Stephen Penick, Crawford, and Kathleen Fuell, Zurich (copied to Fred Hohn, Willis Corroon)	Claims handling issues; defense of insureds		X	X		d. f.

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No.	Date	Description	Subject Matter	Attorney Client Privilege	Work Product	Joint Defense	Other	Deficiency of Defendants' Objection <sup>1</sup>
21.	2/13/04	E-mail from Kathleen Fuell, Zurich, to Nicholas Satriano, AIGDC (copied to Stephen Penick, Crawford,; Fred Hohn, Willis Corroon; Jane Gordon, Esq., GAF; Robert Manning, Claim Manager, GAF; Ann Peri, GAF)	Claims handling issues; defense of insureds		X	X		d. f.
22.	2/13/04	E-mail from Nicholas Satriano, AIGDC, to Kathleen Fuell, Zurich	Claims handling issues; defense of insureds		X	X		d. f.
23.	3/5/04	Handwritten notes from meeting with Fred Hohn, Willis Corroon; Robert Manning, Claim Manager, GAF; Ann Peri, GAF; Anthony Bartell, McCarter English; Jane Gordon, GAF; and related documents	Case status liability and damages issues	X	X	X		a. b. c. d. f.
24.	3/9/04	E-mail from William Conroy, Campbell, to Nicholas Satriano	Discussing venue and plaintiffs' counsel	X	X			b. d. f.
25.	3/29/04	E-mail correspondence from Diane L. Scialabba, Esq., Campbell, to Richard Mastronardo, AIGDC (copied to William Conroy, Esq., Campbell and William A. Rubert, Esq., Campbell)	Case status	X	X			b. d. f.



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26.	3/30/04	E-mail correspondence from Anthony Bartell, Esq., McCarter & English, LLP, to Richard Mastronardo, AIGDC, and Kathleen Fuell, Zurich (copied to Jane Gordon, Esq., GAF; Ann Peri, GAF; Gregory P. Deschenes, Esq., Nixon Peabody; William Conroy, Esq.; Campbell; and Nichole Corona)	Coverage issues; duty to defend BMCA		X	X		b. d. f.
27.	3/30/04	E-mail correspondence from Kathleen Fuell, Zurich, to Anthony Bartell, Esq., McCarter & English, LLP, (copied to Richard Mastronardo, AIGDC; Jane Gordon, Esq., GAF; Ann Peri, GAF; Gregory P. Deschenes, Esq., Nixon Peabody; William Conroy, Esq., Campbell; Nicole Corona; and Fred Hohn, Willis Corroon)	Coverage issues; duty to defend BMCA	X	X	X		b. d. f.
28.	3/31/04	E-mail correspondence from Richard Mastronardo, AIGDC, to Kathleen Fuell, Zurich, and Anthony Bartell, Esq., McCarter & English, LLP (copied to Martin Maturine, AIGDC; Jane Gordon, esq., GAF; Ann Peri, GAF; Gregory P. Deschenes, Esq., Nixon Peabody; William Conroy, Esq., Campbell; and Nicole Corona)	Coverage issues; duty to defend BMCA		X	X		b. d. f.

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29.	3/30/04	E-mail correspondence from Anthony Bartell, Esq., McCarter & English, LLP, to Richard Mastronardo, AIGDC, and Kathleen Fuell, Zurich (copied to Martin Maturine, AIGDC; Jane Gordon, Esq., GAF; Ann Peri, GAF; Gregory P. Deschenes, Esq., Nixon Peabody; William Conroy, Esq., Campbell; and Nicole Corona)	Coverage issues; duty to defend BMCA		X	X		b. d. f.
30.	4/2/04	Handwritten notes by AIGDC claims handler of conversation with Greg Deschenes and Grace Wu, Nixon Peabody	Factual and procedural background; damages and liability issues	X	X	X		b. d. f.
31.	3/22/04	Two e-mails from Kate Brown, to Richard Mastronardo; e-mail from Richard Mastronardo to Kate Brown	Factual background		X	X		a. b. c. d. f.
32.	11/24/03	Letter from Gregory P. Deschenes, Nixon Peabody, to Nicholas Satriano (copied to Jane Gordon, Esq., GAF; Stephen Penick, Crawford; and Robert Manning, Claim Manager, GAF)	Factual and procedural background; damages and liability issues	X	X	X		b. d. f.
33.		Undated/unsigned Pre-Trial Report apparently prepared by Nixon Peabody (Exhibit to 32)	Damages and liability issues	X	X	X		b. d. f.
34.		Transcript of recorded statement of Mr. Carlos Zalewski taken by John Chaney, Crawford & Company (Exhibit to 32)	Liability issues		X	X		c. d. f.

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35.	5/16/03	Letter from David McIntosh, Zurich to John Chaney, Crawford & Company	Defense strategy; damages and liability analysis		X	X		d. f.
36.	5/18/04	Letter from Peter E. Mueller, Esq., Harwood Lloyd, LLC to Martin Maturine, AIGDC	Analysis of coverage issues prepared by coverage counsel retained by AIGDC	X	X			b. d. f.
37.		Trial Digest Reports prepared by Campbell	Analysis of liability, damages, and coverage issues prepared by Campbell at the request of AIGDC	X	X			b. d. f.
38.	12/4/03	Letter from Gregory P. Deschenes, Nixon Peabody, to Nicholas Satriano, AIGDC, Stephen Penick, Crawford & Company, and Kathleen Fuell, Zurich (attachment produced)	Case status, plaintiffs' revised settlement demand	X	X	X		b. d. f.
39.	3/18/05	E-mail from Warren Nitti, AIGDC, to William A. Rubert, Campbell	AIGDC's response to plaintiffs' purported Chapter 93A demand letter	X	X			b. d. f.
40.	3/18/05	E-mail from William A. Rubert, Campbell, to Warren Nitti, AIGDC, and Russell X. Pollock, Esq., Campbell (copied to William Conroy, Esq., Campbell)	AIGDC's response to plaintiffs' purported Chapter 93A demand letter	X	X			b. d. f.

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41.	1/24/05	Executive Claim Summary prepared by Warren Nitti, AIGDC	Case status, analysis of exposure, damages and liability issues		X			d. f.
42.	1/31/05	E-mail from Russell X. Pollock, Esq., Campbell, to Warren Nitti, AIGDC; William Conroy, AIGDC; Myles McDonough, Sloan & Walsh; and Stephanie Chirigotis (attachment produced)	AIGDC response to plaintiffs' purported Chapter 93A demand letter	X	X			b. d. f.
43.	1/11/05	Executive Claim Summary [draft] prepared by Warren Nitti, AIGDC	Case status, analysis of exposure, damages and liability issues		X			d. f.
44.	12/17/04	Letter from Anthony Bartell, McCarter English, to Warren Nitti, AIGDC, and Kathleen Fuell, Zurich (copied to William Conroy, Esq., Campbell; Gregory Deschenes, Esq., Nixon Peabody; Jane Gordon, Esq., GAF; and Ann Peri, GAF)	Response to plaintiffs' purported Chapter 93A demand letter	X	X	X		b. d. f.
45.	12/1/04	E-mail from William Conroy, Esq. to William A. Rubert, Campbell (copied to Warren Nitti, AIGDC, and Russell X. Pollock, Esq., Campbell)	National Union response to plaintiffs' purported chapter 93A demand letter	X	X			b. d. f.
46.	11/30/04	E-mail from William Conroy, Esq. to William A. Rubert, Campbell (copied to Warren Nitti, AIGDC, and Russell X. Pollock, Esq., Campbell)	National Union response to plaintiffs' purported chapter 93A demand letter	X	X			b. d. f.

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47.	11/22/04	Letter from John Knight, Esq., Morrison Mahoney LLP to Warren Nitti, AIGTS	Future handling of <u>Rhodes</u> matter	X	X	X		b. d. f.
48.	10/6/04	E-mail from Russell X. Pollock, Esq., Campbell, to Warren Nitti, AIGDC, and Myles McDonough, Sloan & Walsh (copied to William Conroy, Esq., Campbell)	Appellate issues and strategy	X	X			b. d. f.
49.	10/5/04	E-mail from Warren Nitti, AIGDC to Russell X. Pollock, Esq., Campbell, and Myles McDonough, Sloan & Walsh	Appellate issues and strategy	X	X			b. d. f.
50.	9/28/04	E-mail from Warren Nitti, AIGDC to Russell X. Pollock, Esq., Campbell (copied to William Conroy, Esq., Campbell)	Post-verdict issues and strategy	X	X			b. d. f.
51.	9/28/04	E-mail from Russell X. Pollock, Esq., Campbell, to Warren Nitti, AIGDC	Post-verdict issues and strategy	X	X			b. d. f.
52.	9/1/04	Letter from William Conroy, Esq., Campbell, to Lawrence Boyle, Esq., Morrison, Mahoney & Miller (copied to Russell X. Pollock, Esq., Campbell, and Grace Wu, Nixon Peabody)	Trial strategy	X	X	X		b. d. f.
53.	7/29/04	Executive Claim Summary prepared by Warren Nitti, AIGDC	Case status, analysis of exposure, damages and liability issues		X			c. d. f.
54.	8/12/04	Letter from William A. Rubert, Campbell, to Warren Nitti, AIGDC	Post-mediation status report and legal analysis	X	X			b. d. f.

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55.		Reserve/Autonomy Increase Request	Coding sheet to increase reserve, contains confidential and proprietary reinsurance information		X		X (Relevance)	c. d. f. (Clearly Relevant)
56.	7/29/04	E-mail from William A. Rubert, Campbell, to Warren Nitti, AIGDC	Coverage issues	X	X	X		b. c. d. f.
57.	8/2/04	Memorandum from Walter Nitti, AIGTS, to Tracey Kelly, AIGTS	Analysis of liability, damages, and coverage issues prepared by Campbell at the request of AIGDC	X	X			b. c. d. f.
58.	8/3/04	Memorandum from Walter Nitti, AIGTS, to Tracey Kelly, AIGTS	Analysis of liability, damages, and coverage issues prepared by Campbell at the request of AIGDC	X	X			b. c. d. f.
59.	7/29/04	Executive Claim Summary [draft] prepared by Warren Nitti, AIGDC	Case status, analysis of exposure, damages and liability issues		X			c. d. f.
60.	7/30/04	Letter from William A. Rubert, Campbell, to Jane Gordon, Esq., GAF (copied to Warren Nitti, AIGDC; Greg Deschenes, Nixon Peabody; William Conroy, Esq., Campbell; and Russell X. Pollock, Esq., Campbell)	Mediation/defense strategy	X	X	X		b. d. f.

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61.	8/3/04	Letter from William A. Rubert, Campbell, to Warren Nitti, AIGDC	Status report; insurance coverage issues; defense strategy	X	X	X		b. d. f.
62.	7/21/04	Letter from William A. Rubert, Campbell, to Warren Nitti, AIGDC	Status report; legal analysis; liability and damages issues	X	X			b. d. f.
63.	7/21/04	E-mail from William A. Rubert, Esq., Campbell, to Warren Nitti, AIGDC (Privileged Document No. 8 attached)	Defense issues/deposition testimony analysis	X	X			b. d. f.
64.	7/21/04	E-mail from Warren Nitti, AIGDC to William A. Rubert, Campbell	Defense issues/deposition testimony analysis	X	X			b. d. f.
65.	7/9/04	E-mail from Grace Wu, Esq., Nixon Peabody, to Jane Gordon, Esq., GAF (copied to William Conroy, Esq., Campbell; William A. Rubert, Esq., Campbell; Russell X. Pollock, Esq., Campbell; and Diane L. Scialabba, Esq., Campbell)	Procedural issues	X	X	X		b. d. f.
66.	7/9/04	E-mail from Jane Gordon, Esq., GAF to Grace Wu, Esq., Nixon Peabody; Gregory P. Deschenes, Esq., Nixon Peabody (copied to William Conroy, Esq., Campbell; William A. Rubert, Esq., Campbell; Russell X. Pollock, Esq., Campbell; Diane L. Scialabba, Esq., Campbell)	Trial preparation and defense strategy	X	X	X		b. d. f.



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67.	7/9/04	E-mail from William Conroy, Esq., Campbell to Warren Nitti, AIGDC	Trial preparation and defense strategy	X	X			b. d. f.
68.	7/16/04	E-mail from William A. Rubert, Esq., Campbell to Warren Nitti, AIGDC (copied to William Conroy, Esq., Campbell)	Legal analysis liability and damages issues	X	X			b. d. f.
69.	7/13/04	E-mail from Russell X. Pollock, Esq., Campbell to William Conroy, Esq., Campbell; Diane L. Scialabba, Esq., Campbell and William A. Rubert, Esq., Campbell	Legal analysis; liability and damages issues	X	X			b. d. f.
70.	7/14/04	E-mail from William Conroy, Esq., Campbell, to Warren Nitti, AIGDC (copied to William A. Rubert, Esq., Campbell)	Legal analysis; liability and damages issues	X	X			b. d. f.
71.	7/14/04	E-mail from William A. Rubert, Esq., Campbell to Warren Nitti, AIGDC (copied to William Conroy, Esq., Campbell)	Factual background	X	X			b. d. f.
72.	7/9/04	E-mail from Warren Nitti, AIGDC to William Conroy, Esq., Campbell	Liability and damages issues	X	X			b. d. f.
73.	7/9/04	E-mail from William Conroy, Esq., Campbell, to Warren Nitti, AIGDC	Liability and damages issues	X	X			b. d. f.

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74.	7/9/04	E-mail from William Conroy, Esq., Campbell, to Warren Nitti, AIGDC (copied to William A. Rubert, Esq., Campbell)	Case update; defense strategy	X	X			b. d. f.
75.	7/1/04	E-mail from William Conroy, Esq., Campbell, to Warren Nitti, AIGDC (copied to William A. Rubert, Esq., Campbell)	Case update defense strategy	X	X			b. d. f.
76.	7/1/04	E-mail from warren Nitti, AIGDC to William Conroy, Esq., Campbell (copied to Tracey Kelly, AIGDC)	Defense strategy	X	X			b. d. f.
77.	7/1/04	E-mail from William Conroy, Esq., Campbell, to Warren Nitti, AIGDC (copied to Tracey Kelly, AIGDC)	Defense strategy	X	X			b. d. f.
78.	6/4/04	Letter from Martin Maturine, AIGDC to Anthony Bartell, McCarter English (copied to Gregory P. Deschenes, Esq., Nixon Peabody; William Conroy, Esq., Campbell; and Kathleen Fuell, Zurich)	Coverage issues; defense strategy		X	X		d. f.
79.	6/1/04	Letter from Anthony Bartell, Esq., McCarter English to Martin Maturine, AIGDC (copied to William Conroy, Esq., Campbell; Gregory P. Deschenes, Esq., Nixon Peabody; Jane Gordon, Esq., GAF; Ann Peri, GAF; and Kathleen Fuell, Zurich)	Coverage issues; defense strategy		X	X		d. f.

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80.	6/1/04	Letter from William A. Rubert, Esq., Campbell to Peter E. Mueller, Esq., Harwood Lloyd, LLC (attachment produced)	Coverage issues	X	X	X		b. d. f.
81.	6/2/04	Letter from Martin Maturine, AIGDC to Anthony Bartell, Esq., McCarter English (copied to William Conroy, Esq., Campbell; Gregory P. Deschenes, Esq., Nixon Peabody; and Kathleen Fuell, Zurich)	Coverage issues; defense strategy	X	X	X		b. d. f.
82.	6/1/04	E-mail from William A. Rubert, Esq., Campbell to Martin Maturine, AIGDC (copied to Peter E. Mueller, Esq., Harwood Lloyd, LLC; William Conroy, Esq., Campbell; and Russell X. Pollock, Esq., Campbell)	Liability issues; legal analysis; coverage issues	X	X	X		b. d. f.
83.	5/28/04	E-mail from Peter E. Mueller, Esq., Harwood Lloyd, LLC to William A. Rubert, Esq., Campbell; Martin Maturine, AIGDC and William Conroy, Esq., Campbell (copied to Tracey Kelly, AIGDC)	Liability issues; legal analysis; coverage issues	X	X	X		b. d. f.
84.	5/27/04	E-mail from William A. Rubert, Esq., Campbell to Martin Maturine, AIGDC and William Conroy, Esq., Campbell (copied to Peter E. Mueller, Esq., Harwood Lloyd, LLC; Tracey Kelly, AIGDC)	Coverage issues	X	X	X		b. d. f.

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No.	Date	Description	Subject Matter	Attorney Client Privilege	Work Product	Joint Defense	Other	Deficiency of Defendants' Objection <sup>1</sup>
85.	5/26/04	E-mail from Martin Maturine, AIGDC to William Conroy, Esq., Campbell and William A. Rubert, Esq., Campbell (copied to Tracey Kelly, AIGDC and Peter E. Mueller, Esq., Harwood Lloyd, LLC)	Liability issues; legal analysis; coverage issues	X	X	X		b. d. f.
86.	5/26/04	E-mail from Martin Maturine, AIGDC to William A. Rubert, Esq., Campbell	Legal issues; procedural analysis	X	X			b. d. f.
87.	5/20/04	E-mail from William A. Rubert, Esq., Campbell to Martin Maturine, AIGDC (copied to and [sic] William Conroy, Esq., Campbell; Russell X. Pollock, Esq., Campbell; and Diane L. Scialabba, Esq., Campbell)	Procedural status; defense strategy	X	X			b. d. f.
88.	5/20/04	E-mail from Martin Maturine, AIGDC to William A. Rubert, Esq., Campbell (copied to William Conroy, Esq., Campbell; Diane L. Scialabba, Esq., Campbell; and Russell X. Pollock, Esq., Campbell)	Procedural status; defense strategy	X	X			b. d. f.
89.	5/19/04	E-mail from William A. Rubert, Esq., Campbell to Martin Maturine, AIGDC (copied to and William Conroy, Esq., Campbell; Russell X. Pollock, Esq., Campbell; and Diane L. Scialabba, Esq., Campbell)	Procedural status; defense strategy	X	X			b. d. f.

### Deficiency Legend

- a. – No attorney named
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- d. – Plaintiffs have substantial need for information unavailable elsewhere
- e. – Attorney-client privilege clearly not applicable
- f. – Insufficient information to determine validity (i.e. joint effort, disclosure to third party, etc.)

No.	Date	Description	Subject Matter	Attorney Client Privilege	Work Product	Joint Defense	Other	Deficiency of Defendants' Objection <sup>1</sup>
90.	6/2/04	E-mail from Martin Maturine, AIGDC to Peter E. Mueller, Esq., Harwood Lloyd, LLC	Coverage issues; legal analysis	X	X			b. d. f.
91.	6/2/04	E-mail from Gregory P. Deschenes, Esq., Nixon Peabody to Jane Gordon, Esq., GAF; Kathleen Fuell, Zurich; and Yvonne Santy, Esq., McCarter English (copied to Martin Maturine, AIGDC; William Conroy, Esq., Campbell; Ann Peri, GAF; Anthony Bartell, Esq., McCarter English; and Stephen Penick, Crawford)	Case status; procedural issues; defense strategy		X	X		d. f.
92.	6/1/04	E-mail from Jane Gordon, Esq., GAF to Kathleen Fuell, Zurich; Yvonne Santy, Esq., McCarter English; Gregory P. Deschenes, Esq., Nixon Peabody (copied to Martin Maturine, AIGDC; William Conroy, Esq., Campbell; Ann Peri, GAF; Anthony Bartell, Esq., McCarter English; and Stephen Penick, Crawford)	Case status; procedural issues; defense strategy		X	X		d. f.
93.	6/1/04	E-mail from Kathleen Fuell, Zurich to Yvonne Santy, Esq., McCarter English and Gregory P. Deschenes, Esq., Nixon Peabody (copied to Martin Maturine, AIGDC; William Conroy, Esq., Campbell; Jane Gordon, Esq., GAF; Ann Peri, GAF; Anthony Bartell, Esq., McCarter English; and Stephen Penick, Crawford)	Case status; procedural issues; defense strategy		X	X		d. f.

### Deficiency Legend

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|---|--|
| <ul style="list-style-type: none"> <li>a. – No attorney named</li> <li>b. – Insufficient information regarding attorney-client relationship</li> <li>c. – No explanation of whether created in anticipation of litigation or ordinary course of business</li> </ul> | <ul style="list-style-type: none"> <li>d. – Plaintiffs have substantial need for information unavailable elsewhere</li> <li>e. – Attorney-client privilege clearly not applicable</li> <li>f. – Insufficient information to determine validity (i.e. joint effort, disclosure to third party, etc.)</li> </ul> |
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No.	Date	Description	Subject Matter	Attorney Client Privilege	Work Product	Joint Defense	Other	Deficiency of Defendants' Objection <sup>1</sup>
94.	6/3/04	E-mail from Martin Maturine, AIGDC to Gregory P. Deschenes, Esq., Nixon Peabody (copied to William Conroy, Esq., Campbell; Jane Gordon, Esq., GAF; Kathleen Fuell, Zurich)	Defense strategy		X	X		d. f.
95.	6/3/04	E-mail from Martin Maturine, AIGDC to Peter E. Mueller, Esq., Harwood Lloyd, LLC	Coverage issues; legal analysis	X	X			b. c. d. f.
96.	6/3/04	E-mail from Peter E. Mueller, Esq., Harwood Lloyd, LLC to Martin Maturine, AIGDC	Coverage issues; legal analysis	X	X			b. c. d. f.
97.	6/3/04	E-mail from Kathleen Fuell, Zurich to Martin Maturine, AIGDC (copied to Gregory P. Deschenes, Esq., Nixon Peabody; William Conroy, Esq., Campbell; Jane Gordon, Esq., GAF; Ann Peri, GAF; Stephen Penick, Crawford; Robert Manning, Claim Manager, GAF; and Fred Hohn, Willis Corroon)	Defense strategy		X	X		d. f.
98.	6/4/04	E-mail from Martin Maturine, AIGDC to Kathleen Fuell, Zurich and Peter E. Mueller, Esq., Harwood Lloyd, LLC (copied to Gregory P. Deschenes, Esq., Nixon Peabody; William Conroy, Esq., Campbell; Jane Gordon, Esq., GAF; Ann Peri, GAF; Stephen Penick, Crawford; Robert Manning, Claim Manager, GAF; and Fred Hohn, Willis Corroon)	Defense strategy; coverage issues		X	X		d. f.

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No.	Date	Description	Subject Matter	Attorney Client Privilege	Work Product	Joint Defense	Other	Deficiency of Defendants' Objection <sup>1</sup>
99.	6/8/04	E-mail from Martin Maturine, AIGDC to William Conroy, Esq., Campbell and William A. Rubert, Esq., Campbell (copied to Gregory P. Deschenes, Esq., Nixon Peabody; Kathleen Fuell, Zurich; and Anthony Bartell, Esq., McCarter English)	Defense strategy		X	X		d. f.
100.	6/4/04	E-mail from Martin Maturine, AIGDC to Peter E. Mueller, Esq., Harwood Lloyd, LLC	Coverage issues	X	X			b. c. d. f.
101.	5/26/04	Letter from Martin Maturine, AIGDC to Anthony Bartell, Esq., McCarter English (copied to Gregory P. Deschenes, Esq., Nixon Peabody; William Conroy, Esq., Campbell; and Kathleen Fuell, Zurich)	Liability issues; coverage issues; defense strategy		X	X		d. f.
102.	5/27/04	E-mail from Martin Maturine, AIGDC to William Conroy, Esq., Campbell and William A. Rubert, Esq., Campbell	Defense strategy and liability/damages issues	X	X			b. d. f.
103.	5/27/04	E-mail from William A. Rubert, Esq., Campbell to Martin Maturine, AIGDC and William Conroy, Esq., Campbell (copied to Tracey Kelly, AIGDC and Peter E. Mueller, Esq., Harwood Lloyd, LLC)	Legal analysis; defense strategy; liability issues	X	X			b. d. f.



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No.	Date	Description	Subject Matter	Attorney Client Privilege	Work Product	Joint Defense	Other	Deficiency of Defendants' Objection <sup>1</sup>
104.	5/24/04	Letter from Martin Maturine, AIGDC to Anthony Bartell, Esq., McCarter English (copied to Gregory P. Deschenes, Esq., Nixon Peabody; William Conroy, Esq., Campbell; and Kathleen Fuell, Zurich) [Draft]	Liability issues; coverage issues; defense strategy		X	X		d. f.
105.	5/21/04	E-mail from Kathleen Fuell, Zurich to Martin Maturine, AIGDC (copied to Jane Gordon, Esq., GAF; Gregory P. Deschenes, Esq., Nixon Peabody; Anthony Bartell, Esq., McCarter English; Ann Peri, GAF; William A. Rubert, Esq., Campbell; Stephen Penick, Crawford; Nicole Corona; Robert Manning, Claim Manager, GAF; and Fred Hohn, Willis Corroon)	Defense strategy; coverage issues		X	X		d. f.
106.	5/14/04	E-mail from Jane Gordon, Esq., GAF to Kathleen Fuell, Zurich (copied to Gregory P. Deschenes, Esq., Nixon Peabody; Anthony Bartell, Esq., McCarter English; Ann Peri, GAF)	Defense strategy		X	X		d. f.
107.	5/14/04	E-mail from William A. Rubert, Esq., Campbell to Gregory P. Deschenes, Esq., Nixon Peabody; Grace Wu, Esq., Nixon Peabody and Russell X. Pollock, Esq., Campbell (copied to Jane Gordon, Esq., GAF; William Conroy, Esq., Campbell and Diane L. Scialabba, Esq., Campbell) (draft pleading attached)	Defense strategy	X	X	X		b. d. f.

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No.	Date	Description	Subject Matter	Attorney Client Privilege	Work Product	Joint Defense	Other	Deficiency of Defendants' Objection <sup>1</sup>
108.	5/21/04	Letter from Anthony Bartell, Esq., McCarter English to Martin Maturine, AIGDC (copied to William Conroy, Esq., Campbell; Gregory P. Deschenes, Esq., Nixon Peabody; Jane Gordon, Esq., GAF; Ann Peri; GAF; and Kathleen Fuell, Zurich)	Coverage issues; defense strategy		X	X		d. f.
109.	4/7/04	E-mail from Joseph Riccobono, DBG Reinsurance, to Martin Maturine, AIGDC	Reinsurance		X		X (Relevance)	c. d. f. (Clearly Relevant)
110.	4/7/04	E-mail from Joseph Riccobono, DBG Reinsurance, to Robert Osborne, AIG	Reinsurance		X		X (Relevance)	c. d. f. (Clearly Relevant)
111.	5/19/04	E-mail from Robert Osborne, AIG to Joseph Riccobono, DBG Reinsurance	Reinsurance		X		X (Relevance)	c. d. f. (Clearly Relevant)
112.	5/19/04	E-mail from Joseph Riccobono, DBG Reinsurance to Martin Maturine, AIGDC	Reinsurance		X		X (Relevance)	c. d. f. (Clearly Relevant)
113.	5/19/04	Letter from Martin Maturine, AIGDC to Anthony Bartell, Esq., McCarter English (copied to William Conroy, Esq., Campbell; Gregory P. Deschenes, Esq., Nixon Peabody; and Kathleen Fuell, Zurich)	Coverage issues; defense strategy		X	X		d. f.

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No.	Date	Description	Subject Matter	Attorney Client Privilege	Work Product	Joint Defense	Other	Deficiency of Defendants' Objection <sup>1</sup>
114.	5/19/04	Letter from Martin Maturine, AIGDC to Anthony Bartell, Esq., McCarter English (copied to William Conroy, Esq., Campbell; Gregory P. Deschenes, Esq., Nixon Peabody; and Kathleen Fuell, Zurich) <i>[draft – handwritten notes by Tracey Kelly]</i>	Coverage issues; defense strategy		X			d. f.
115.	5/18/04	E-mail from Peter E. Mueller, Esq., Harwood Lloyd, LLC to Martin Maturine, AIGDC	Coverage issues	X	X			b. d. f.
116.	5/18/04	E-mail from Martin Maturine, AIGDC to Peter E. Mueller, Esq., Harwood Lloyd, LLC	Coverage issues; legal analysis	X	X			b. d. f.
117.	5/18/04	E-mail from William Conroy, Esq., Campbell to Martin Maturine, AIGDC (copied to William A. Rubert, Esq., Campbell)	Defense strategy	X	X			b. d. f.
118.		Case Summary prepared by AIGDC claims handler	Internal analysis of liability/damages	X	X			a. b. c. d. e. f.
119.	5/14/04	E-mail from Russell X. Pollock, Esq., Campbell to William Conroy, Esq., Campbell; William A. Rubert, Esq., Campbell; and Diane L. Scialabba, Esq., Campbell	Analysis of Dr. Roaf's deposition	X	X			b. d. f.
120.	5/14/04	E-mail from William Conroy, Esq., Campbell to Martin Maturine, AIGDC	Analysis of Dr. Roaf's deposition	X	X			b. d. f.

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No.	Date	Description	Subject Matter	Attorney Client Privilege	Work Product	Joint Defense	Other	Deficiency of Defendants' Objection <sup>1</sup>
121.	5/13/04	E-mail from Russell X. Pollock, Esq., Campbell to William Conroy, Esq., Campbell; William A. Rubert, Esq., Campbell; and Diane L. Scialabba, Esq., Campbell	Analysis of Dr. Beisaw's deposition	X	X			b. d. f.
122.	5/13/04	E-mail from William Conroy, Esq., Campbell to Martin Maturine, AIGDC	Analysis of Dr. Beisaw's deposition	X	X			b. d. f.
123.	5/11/04	E-mail from Russell X. Pollock, Esq., Campbell to William Conroy, Esq., Campbell; William A. Rubert, Esq., Campbell; and Diane L. Scialabba, Esq., Campbell	Analysis of Dr. Krauth's deposition	X	X			b. d. f.
124.	5/12/04	E-mail from William Conroy, esq., Campbell to Martin Maturine, AIGDC (copied to William A. Rubert, Esq., Campbell)	Analysis of Dr. Krauth's deposition; defense strategy	X	X			b. d. f.
125.	5/12/04	E-mail from Martin Maturine, AIGDC to William Conroy, Esq., Campbell (copied to William A. Rubert, Esq., Campbell)	Defense strategy; liability issues	X	X			b. d. f.
126.	5/4/04	Letter from William Conroy, Esq., Campbell to Martin Maturine, AIGDC	Defense strategy; liability issues	X	X			b. d. f.
127.	4/30/04	E-mail from Martin Maturine, AIGDC to William A. Rubert, Esq., Campbell	Coverage/liability issues	X	X			b. d. f.
128.	4/30/04	E-mail from William A. Rubert, Esq., Campbell to Martin Maturine, AIGDC	Coverage/liability issues	X	X			b. d. f.

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No.	Date	Description	Subject Matter	Attorney Client Privilege	Work Product	Joint Defense	Other	Deficiency of Defendants' Objection <sup>1</sup>
129.	4/30/04	E-mail from Martin Maturine, AIGDC to William A. Rubert, Esq., Campbell	Coverage/liability issues	X	X			b. d. f.
130.	4/19/04	E-mail from Martin Maturine, AIGDC to William A. Rubert, Esq., Campbell	Coverage/liability issues	X	X			b. d. f.
131.	4/19/04	E-mail from William A. Rubert, Esq., Campbell to Martin Maturine, AIGDC	Coverage/liability issues	X	X			b. d. f.
132.	4/16/04	E-mail from Martin Maturine, AIGDC to William A. Rubert, Esq., Campbell	Coverage/liability issues	X	X			b. d. f.
133.	4/19/04	E-mail from William A. Rubert, Esq., Campbell to Martin Maturine, AIGDC	Coverage/liability issues	X	X			b. d. f.
134.	4/16/04	E-mail from Martin Maturine, AIGDC to Kathleen Fuell, Zurich (copied to William A. Rubert, Esq., Campbell)	Coverage/defense issues		X	X		d. f.
135.	4/16/04	E-mail from Kathleen Fuell, Zurich to Martin Maturine, AIGDC (copied to Stephen Penick, Crawford)	Coverage/defense issues		X	X		d. f.
136.	4/16/04	E-mail from Martin Maturine, AIGDC to Kathleen Fuell, Zurich (copied to William A. Rubert, Esq., Campbell)	Coverage/defense issues		X	X		d. f.
137.	4/30/04	E-mail from William Conroy, Esq., Campbell to Martin Maturine, AIGDC (copied to William A. Rubert, Esq., Campbell; Diane L. Scialabba, Esq., Campbell; and Robert Toland, Esq., Campbell)	Liability analysis; legal analysis	X	X			b. d. f.

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No.	Date	Description	Subject Matter	Attorney Client Privilege	Work Product	Joint Defense	Other	Deficiency of Defendants' Objection <sup>1</sup>
138.	4/20/04	E-mail from Peter E. Mueller, Esq., Harwood Lloyd, LLC to Martin Maturine, AIGDC	Coverage issues	X	X			b. c. d. f.
139.	4/20/04	E-mail from Martin Maturine, AIGDC to Peter E. Mueller, Esq., Harwood Lloyd, LLC	Coverage issues	X	X			b. c. d. f.
140.	4/6/04	E-mail from William Conroy, Esq., Campbell to Martin Maturine, AIGDC and Richard Mastronardo, AIGDC	Defense strategy	X	X			b. d. f.
141.	4/15/04	E-mail from William A. Rubert, Esq., Campbell to Martin Maturine, AIGDC	Coverage issues	X	X			b. d. f.
142.	4/15/04	E-mail from William Conroy, Esq., Campbell to Martin Maturine, AIGDC	Defense strategy	X	X			b. d. f.
143.	4/14/04	E-mail from Martin Maturine, AIGDC to William Conroy, Esq., Campbell	Defense strategy	X	X			b. d. f.
144.	4/14/04	E-mail from William Conroy, Esq., Campbell to William A. Rubert, Esq., Campbell and Martin Maturine, AIGDC	Defense strategy	X	X			b. d. f.
145.	4/12/04	E-mail from William A. Rubert, Esq., Campbell to Martin Maturine, AIGDC	Defense strategy; liability analysis	X	X			b. d. f.
146.	4/14/04	E-mail from William A. Rubert, Esq., Campbell to Martin Maturine, AIGDC	Defense strategy; liability analysis	X	X			b. d. f.
147.	4/7/04	E-mail from William Conroy, Esq., Campbell to Martin Maturine, AIGDC	Defense strategy; liability analysis	X	X			b. d. f.

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No.	Date	Description	Subject Matter	Attorney Client Privilege	Work Product	Joint Defense	Other	Deficiency of Defendants' Objection <sup>1</sup>
148.	4/7/04	E-mail from Martin Maturine, AIGDC to William Conroy, Esq., Campbell	Defense strategy; liability analysis	X	X			b. d. f.
149.	4/6/04	E-mail from William Conroy, Esq., Campbell to Richard Mastronardo, AIGDC and Martin Maturine, AIGDC	Defense strategy	X	X			b. d. f.
150.	4/2/04	Letter from Martin Maturine, AIGDC to Kathleen Fuell, Zurich (copied to William Conroy, Esq., Campbell; Gregory P. Deschenes, Esq., Nixon Peabody; Fred Hohn, Willis Corroon; Stewart Smith Facilities, Inc.)	Coverage issues		X	X		c. d. f.
151.	4/16/04	Letter from Martin Maturine, AIGDC to Kathleen Fuell, Zurich	Coverage issues		X	X		c. d. f.
152.	4/16/04	Letter from Martin Maturine, AIGDC to William A. Rubert, Esq., Campbell	Coverage issues	X	X			b. c. d. f.
153.	4/12/04	Letter from William Conroy, Esq., Campbell to Martin Maturine, AIGDC	Liability/damages analysis	X	X			b. d. f.
154.	5/17/04	Letter from Anthony Bartell, Esq., McCarter English to Richard Mastronardo, AIGDC	Coverage issues; defense strategy		X	X		d. f.
155.	4/21/04	Letter from Martin Maturine, AIGDC to Peter E. Mueller, Esq., Harwood Lloyd, LLC	Coverage issues	X	X			b. c. d. f.



### Deficiency Legend

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No.	Date	Description	Subject Matter	Attorney Client Privilege	Work Product	Joint-Defense	Other	Deficiency of Defendants' Objection <sup>1</sup>
156.	4/16/04	E-mail from Martin Maturine, AIGDC to Kathleen Fuell, Zurich (copied to William A. Rubert, Esq., Campbell)	Coverage issues; defense strategy		X	X		d. f.
157.	4/16/04	Letter from Martin Maturine, AIGDC to Kathleen Fuell, Zurich (copied to William Conroy, Esq., Campbell)	Coverage issues; defense strategy		X			d. f.
158.	5/18/04	Letter from Martin Maturine, AIGDC to Anthony Bartell, Esq., McCarter English (copied to William Conroy, Esq., Campbell; Gregory P. Deschenes, Esq., Nixon Peabody; and Peter E. Mueller, Esq., Harwood Lloyd, LLC)	Coverage issues; defense strategy		X	X		d. f.
159.	5/18/04	Letter from William Conroy, Esq., Campbell to Anthony Bartell, Esq., McCarter English (copied to Gregory P. Deschenes, Esq., Nixon Peabody; Jane Gordon, Esq., GAF; and Martin Maturine, AIGDC)	Defense issues		X	X		d. f.
160.	4/2/04	Letter from Gregory P. Deschenes, Esq., Nixon Peabody to Jane Gordon, Esq., GAF (copied to Grace Wu, Nixon Peabody; Kathleen Fuell, Zurich; Richard Mastronardo, AIGDC; Stephen Penick, Crawford; and Melissa Bayer Tearney, Esq.) (enclosure produced)	Litigation status report; liability issues		X	X		d. f.

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No.	Date	Description	Subject Matter	Attorney Client Privilege	Work Product	Joint Defense	Other	Deficiency of Defendants' Objection <sup>1</sup>
161.	3/29/04	Letter from Kathleen Fuell, Zurich to Richard Mastronardo, AIGDC (copied to Jane Gordon, Esq., GAF; Gregory P. Deschenes, Esq., Nixon Peabody; Stephen Penick, Crawford; Lawrence Boyle, Esq., Morrison, Mahoney & Miller; John Johnson, Esq., Corrigan, Johnson & tutor; Fred Hohn, Willis Corroon; and Robert Manning, Claim Manager, GAF)	Coverage issues		X	X		c. d. f.
162.	3/30/04	Letter from Anthony Bartell, Esq., McCarter English to Richard Mastronardo, AIGDC and Kathleen Fuell, Zurich (copied to Jane Gordon, Esq., GAF; Gregory P. Deschenes, Esq., Nixon Peabody; William Conroy, Esq., Campbell; and Ann Peri, GAF)	Coverage issues; defense strategy		X	X		d. f.
163.	3/23/04	Letter from Grace Wu, Nixon Peabody to William Conroy, Esq., Campbell (copied Nicholas Satriano, AIGDC)	Defense issues	X	X	X		b. d. f.
164.	3/18/04	Letter from Anthony Bartell, Esq., McCarter English to Nicholas Satriano, AIGDC (copied to Richard Mastronardo, AIGDC; William Conroy, Esq., Campbell; Gregory P. Deschenes, Esq., Nixon Peabody; and Jane Gordon, Esq., GAF)	Defense strategy		X	X		d. f.

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No.	Date	Description	Subject Matter	Attorney Client Privilege	Work Product	Joint Defense	Other	Deficiency of Defendants' Objection <sup>1</sup>
165.	2/20/02	Letter from Anthony Bartell, Esq., McCarter English to Nicholas Satriano, AIGDC (copied to William Conroy, Esq., Campbell; Gregory P. Deschenes, Esq., Nixon Peabody; and Jane Gordon, Esq., GAF)	Coverage issues; defense strategy		X	X		d. f.
166.	2/13/04	Letter from Nicholas Satriano, AIGDC to Anthony Bartell, Esq., McCarter English (copied to William Conroy, Esq., Campbell; Gregory P. Deschenes, Esq., Nixon Peabody; Stephen Penick, Crawford; Kathleen Fuell, Zurich; Jane Gordon, Esq., GAF; Fred Hohn, Willis Corroon; and Robert Manning, Claim Manager, GAF)	Coverage issues; defense strategy		X	X		d. f.
167.	2/4/04	Letter from Anthony Bartell, Esq., McCarter English to William Conroy, Esq., Campbell and Nicholas Satriano, AIGDC (copied to Jane Gordon, Esq., GAF and Gregory P. Deschenes, Esq., Nixon Peabody)	Coverage issues; defense strategy		X	X		d. f.
168.	1/20/04	Letter from William Conroy, Esq., Campbell to Anthony Bartell, Esq., McCarter English (copied to Nicholas Satriano, AIGDC and Gregory P. Deschenes, Esq., Nixon Peabody)	Coverage issues; defense strategy		X	X		d. f.

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No.	Date	Description	Subject Matter	Attorney Client Privilege	Work Product	Joint Defense	Other	Deficiency of Defendants' Objection <sup>1</sup>
169.	1/14/04	Letter from Anthony Bartell, Esq., McCarter English to Nicholas Satriano, AIGDC (copied to William Conroy, Esq., Campbell and Gregory P. Deschenes, Esq., Nixon Peabody)	Coverage issues; defense strategy		X	X		d. f.
170.	12/19/03	Letter from Anthony Bartell, Esq., McCarter English to Nicholas Satriano, AIGDC (copied to William Conroy, Esq., Campbell and Gregory P. Deschenes, Esq., Nixon Peabody)	Coverage issues; defense strategy		X	X		d. f.
171.	12/24/03	Letter from William Conroy, Esq., Campbell to Nicholas Satriano, AIGDC	Defense strategy	X	X			b. d. f.
172.	12/24/03	Letter from William Conroy, Esq., Campbell to Gregory P. Deschenes, Esq., Nixon Peabody (copied to Nicholas Satriano, AIGDC)	Defense strategy	X	X	X		b. d. f.
173.	11/24/03	Letter from Gregory P. Deschenes, Esq., Nixon Peabody to Nicholas Satriano, AIGDC (copied to Jane Gordon, Esq., GAF; Stephen Penick, Crawford; and Robert Manning, Claim Manager, GAF)	Defense strategy; case status; liability issues	X	X	X		b. d. f.
174.	11/13/03	Report from John Chaney, Crawford Risk Management Services to Robert Manning, Claim Manager, GAF (copied to AIGTS; David McIntosh, Zurich; Jeff Sickles, NEASC; Gregory P. Deschenes, Esq., Nixon Peabody)	Defense strategy; damages and liability analysis		X	X		d. f.

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No.	Date	Description	Subject Matter	Attorney Client Privilege	Work Product	Joint Defense	Other	Deficiency of Defendants' Objection <sup>1</sup>
175.	8/11/03	Letter from Lawrence F. Boyle, Esq., Morrison, Mahoney & Miller to Jody Mills, Crawford & Company	Defense strategy; damages and liability analysis	X	X	X		b. d. f.
176.	11/13/03	Report from Jody Mills, Crawford Risk Management Services to Robert Manning, Claim Manager, GAF (copied to AIGTS; David McIntosh, Zurich; Jeff Sickles, NEASC)	Defense strategy; damages and liability analysis		X	X		b. d. f.
177.	7/7/03	Status report from Gregory P. Deschenes, Esq., Nixon Peabody to Jody Mills, Crawford & Company (copied to Jane Gordon, Esq., GAF)	Defense strategy; damages and liability analysis	X	X	X		b. d. f.
178.	7/15/03	Letter from Lawrence F. Boyle, Esq., Morrison, Mahoney & Miller to Jody Mills, Crawford & Company	Defense strategy; damages and liability analysis	X	X	X		b. d. f.
179.	9/24/03	Report from Jody Mills, Crawford Risk Management Services to Robert Manning, Claim Manager, GAF (copied to AIGTS; David McIntosh, Zurich; Jeff Sickles, NEASC; Gregory P. Deschenes, Esq., Nixon Peabody)	Defense strategy; damages and liability analysis		X	X		d. f.
180.	9/16/03	Letter from Lawrence F. Boyle, Esq., Morrison, Mahoney & Miller to Jody Mills, Crawford & Company (jury verdict research attached)	Defense strategy; damages and liability analysis	X	X	X		b. d. f.

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No.	Date	Description	Subject Matter	Attorney Client Privilege	Work Product	Joint Defense	Other	Deficiency of Defendants' Objection <sup>1</sup>
181.	9/11/03	Report from Jody Mills, Crawford Risk Management Services to David McIntosh, Zurich (copied to Robert Manning, Claim Manager, GAF; AIGTS; Nixon Peabody; Crawford & Company NERTC)	Defense strategy; damages and liability analysis		X	X		d. f.
182.	8/25/03	Letter from John B. Johnson, Esq., Corrigan, Johnson & Tutor, P.A. to Jody Mills, Crawford & Company	Defense strategy; damages and liability analysis	X	X	X		b. d. f.
183.	8/15/03	Status report from Gregory P. Deschenes, Esq., Nixon Peabody to Jody Mills, Crawford & Company (copied to Jane Gordon, Esq., GAF)	Defense strategy; damages and liability analysis	X	X	X		b. d. f.
184.	10/9/03	Report from Jody Mills, Crawford Risk Management Services to Robert Manning, Claim Manager, GAF (copied to AIGTS; David McIntosh, Zurich; Jeff Sickles, NEASC; Gregory P. Deschenes, Esq., Nixon Peabody)	Defense strategy; damages and liability analysis		X	X		d. f.
185.	9/26/03	Letter from Lawrence F. Boyle, Esq., Morrison, Mahoney & Miller to Jody Mills, Crawford & Company	Defense strategy; damages and liability analysis	X	X	X		b. d. f.
186.	6/4/03	Report from Jody Mills, Crawford Risk Management Services to David McIntosh, Zurich (copied to Robert Manning, Claim Manager, GAF; AIGTS; Nixon Peabody; Crawford & Company NE RTC)	Defense strategy; damages and liability analysis		X	X		d. f.

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No.	Date	Description	Subject Matter	Attorney Client Privilege	Work Product	Joint Defense	Other	Deficiency of Defendants' Objection <sup>1</sup>
187.	5/6/03	Report from Jody Mills, Crawford Risk Management Services to Robert Manning, Claim Manager, GAF (copied to AIGTS; David McIntosh, Zurich; Jeff Sickles, NEASC)	Defense strategy; damages and liability analysis		X	X		d. f.
188.	1/16/03	Letter from Tracey Kelly, AIGDC, to John Chaney, Crawford & Company	Defense strategy		X	X		d. f.
189.	11/19/03	E-mail from Stephen Penick, Crawford to Nicholas Satriano, AIGDC (copied to Gregory P. Deschenes, Esq., Nixon Peabody)	Defense issues	X	X	X		b. d. f.
190.	12/13/03	Report from Crawford Risk Management Services to Robert Manning, Claim Manager, GAF (copied to AIGTS; David McIntosh, Zurich; Jeff Sickles, NEASC)	Defense strategy; damages and liability analysis		X	X		d. f.
191.	5/6/03	Report from John Chaney, Crawford Risk Management Services to Robert Manning, Claim Manager, GAF (copied to AIGTS; Zurich; Jeff Sickles, NEASC)	Defense strategy; damages and liability analysis		X	X		d. f.
192.	6/28/02	Letter from Michael J. Murphy, Ringler Associates, to Tracey Kelly, AIGDC	Claim resolution services		X			c. d. f.
193.	4/9/02	Letter from Tracey Kelly, AIGDC to John Chaney, Crawford & Company (copied to Robert Manning, Claim Manager, GAF and Dennis M. Duggan, Esq., Nixon Peabody, LLP)	Defense strategy	X	X	X		b. d. f.



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No.	Date	Description	Subject Matter	Attorney Client Privilege	Work Product	Joint Defense	Other	Deficiency of Defendants' Objection <sup>1</sup>
194.	1/30/02	Report from John Chaney, Crawford to Robert Manning, Claim Manager, GAF (copied to Dennis M. Duggan, Esq., Nixon Peabody, LLP; Zurich; Robert Flugger, Building Materials Corp. of America)	Defense strategy; damages and liability analysis		X	X		c. d. f.
195.	1/29/02	Facsimile from Robert Manning, Claim Manager, GAF to John Chaney, Crawford	Defense strategy	X	X	X		a. b. c. d. e. f.
196.		Facsimile from John Chaney, Crawford to Ed Shoulkin	Defense issues	X	X	X		a. b. c. d. e. f.
197.	12/20/02	Letter from John B. Johnson, Esq., Corrigan, Johnson & Tutor, P.A. to John Chaney, Crawford & Company (copied to Timothy Bray, Esq.)	Defense strategy; damages and liability analysis	X	X	X		b. d. f.
198.	1/29/03	Letter from John B. Johnson, Esq., Corrigan, Johnson & Tutor, P.A. to John Chaney, Crawford & Company (copied to Timothy Bray, Esq.)	Defense strategy; damages and liability analysis	X	X	X		b. d. f.
199.	4/25/03	Letter from John B. Johnson, Esq., Corrigan, Johnson & tutor, P.A. to Jody Mills, Crawford & Company (copied to Timothy Bray, Esq.)	Defense strategy; damages and liability analysis	X	X	X		b. d. f.
200.	7/22/03	Report from Jody Mills, Crawford Risk Management Services to Robert Manning, Claim Manager, GAF (copied to AIGTS; David McIntosh, Zurich; Jeff Sickles (NEASC)	Defense strategy; damages and liability analysis		X	X		d. f.

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No.	Date	Description	Subject Matter	Attorney Client Privilege	Work Product	Joint Defense	Other	Deficiency of Defendants' Objection <sup>1</sup>
201.	7/1/03	Facsimile from David McIntosh, Zurich to Claims Manager, Crawford	Defense strategy; damages and liability analysis		X	X		d. f.
202.	6/4/03	Report from Jody Mills, Crawford Risk Management Services to Zurich (copied to Robert Manning, Claim Manager, GAF; Nixon Peabody; AIGTS; Crawford & Company NE RTC)	Defense strategy; damages and liability analysis		X	X		d. f.
203.	9/25/02	Report from John Chaney, Crawford Risk Management Services to Robert Manning, Claim Manager, GAF (copied to Zurich; AIGTS; Jeff Sickles, NEASC)	Defense strategy; damages and liability analysis		X	X		d. f.
204.	8/22/02	Letter from John B. Johnson, Esq., Corrigan, Johnson & Tutor, P.A. to John Chaney, Crawford & Company	Defense strategy; damages and liability analysis	X	X	X		b. d. f.
205.	8/15/02	Letter from John B. Johnson, Esq., Corrigan, Johnson & Tutor, P.A. to John Chaney, Crawford & Company	Defense strategy; damages and liability analysis	X	X	X		b. d. f.
206.	8/6/02	Letter from Mary Ann Scheneman, Litigation Claims Examiner, Penske, to John Chaney, Crawford & Company and Gary Mathieson, Willis of New York (enclosure produced)	Coverage issues	X	X	X		b. c. d. f.

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No.	Date	Description	Subject Matter	Attorney Client Privilege	Work Product	Joint Defense	Other	Deficiency of Defendants' Objection <sup>1</sup>
207.	8/5/02	Letter from Grace Wu, Nixon Peabody to Driver Logistics Services, Inc. (copied to Jane Gordon, Esq., GAF; John Chaney, Crawford & Company; Melissa B. Tearney, Nixon Peabody; Dennis M. Duggan, Esq., Nixon Peabody; Michael Somma)	Defense and indemnification issues	X	X	X		b. d. f.
208.	7/31/02	Letter from Grace Wu, Nixon Peabody to Mary Ann Scheneman, Litigation Claims Examiner, Penske (copied to Jane Gordon, Esq., GAF and John Chaney, Crawford & Company)	Defense and indemnification issues	X	X	X		b. d. f.
209.	7/2/02	Letter from Grace Wu, Nixon Peabody to Mary Ann Scheneman, Litigation Claims Examiner, Penske (copied to Jane Gordon, esq., GAF and John Chaney, Crawford & Company)	Defense and indemnification issues	X	X	X		b. d. f.
210.	7/3/02	Letter from Grace Wu, Nixon Peabody to Mary Ann Scheneman, Litigation Claims Examiner, Penske (copied to Jane Gordon, Esq., GAF and John Chaney, Crawford & Company)	Defense and indemnification issues	X	X	X		b. d. f.
211.	6/10/02	Report from John Chaney, Crawford Risk Management Services to Robert Manning, Claim Manager, GAF (copied to AIGTS; Zurich; Jeff Sickles, NEASC)	Defense strategy; damages and liability analysis		X	X		c. d. f.

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212.	4/8/02	Report from John Chaney, Crawford Risk Management Services to Robert Manning, Claim Manager, GAF (copied to AIGTS; Zurich)	Defense strategy; damages and liability analysis		X	X		c. d. f.
213.	3/23/04	Excess Claim Note written by Richard Mastronardo, AIGDC	Retention of coverage counsel; coverage issues	X	X			a. b. c. d. f.
214.	3/9/04	Excess Claim Note written by Nicholas Satriano, AIGDC	Defense strategy		X	X		d. f.
215.	2/24/04	Excess Claim Note written by Nicholas Satriano, AIGDC	Defense strategy		X			d. f.
216.	2/13/04	Excess Claim Note written by Nicholas Satriano, AIGDC	Defense strategy		X	X		d. f.
217.	12/18/03	Excess Claim Note written by Nicholas Satriano, AIGDC	Defense strategy		X			d. f.
218.	9/26/03	Excess Claim Note written by Nicholas Satriano, AIGDC	Defense strategy		X			d. f.
219.	8/29/03	Excess Claim Note written by Nicholas Satriano, AIGDC	Defense strategy		X			d. f.
220.	11/8/02	Excess Claim Note written by Tracey Kelly, AIGDC	Defense strategy; coverage issues		X	X		d. f.

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No.	Date	Description	Subject Matter	Attorney Client Privilege	Work Product	Joint Defense	Other	Deficiency of Defendants' Objection <sup>1</sup>
221.	4/8/02	Excess Claim Note written by Tracey Kelly, AIGDC	Defense strategy; coverage issues		X	X		c. d. f.
222.	3/11/02	Excess Claim Note written by Bryan Pedro, AIGDC to Tracey Kelly, AIGDC	Assignment note		X			c. d. f.
223.	3/5/02	Excess Claim Note written by James Joanos, AIGDC	Initial claim analysis; assignment note		X			c. d. f.
224.	2/11/02	Excess Claim Note written by John Kurila, AIGDC	Initial claim analysis; assignment note		X			c. d. f.
225.	4/19/2004	Excess Claim Note written by Martin Maturine, AIGDC	Defense strategy; retention of coverage counsel; coverage issues	X	X			a. b. c. d. f.
226.	4/13/05	Excess Claim Note written by Warren Nitti, AIGDC	Pleadings in Chapter 93A/Chapter 176D matter		X			d. f.
227.	2/1/05	Excess Claim Note written by Warren Nitti, AIGDC	Settlement of underlying matter and Chapter 93A/Chapter 176D matter	X	X			a. b. d. f.
228.	12/10/04	Excess Claim Note written by Warren Nitti, AIGDC	Coverage issues; post-trial motion strategy		X	X		c. d. f.
229.	10/25/04	Excess Claim Note written by Warren Nitti, AIGDC	Post-trial defense strategy		X			d. f.

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No.	Date	Description	Subject Matter	Attorney Client Privilege	Work Product	Joint Defense	Other	Deficiency of Defendants' Objection <sup>1</sup>
230.	8/18/04	Excess Claim Note written by Warren Nitti, AIGDC (pre-trial report to Tracey Kelly, AIGDC)	Defense strategy; liability analysis; coverage analysis; damages analysis		X			c. d. f.
231.	8/12/04	Excess Claim Note written by Warren Nitti, AIGDC	Mediation		X			d. f.
232.	6/8/04	Excess Claim Note written by Martin Maturine, AIGDC	Defense strategy; communication with defense counsel	X	X			b. d. f.
233.	6/1/04	Excess Claim Note written by Martin Maturine, AIGDC	Liability issues; coverage issues; defense strategy; communication with defense counsel; communication with coverage counsel	X	X			b. d. f.
234.	5/27/04	Excess Claim Note written by Martin Maturine, AIGDC	Defense strategy; communication with defense counsel	X	X			b. d. f.
235.	5/27/04	Excess Claim Note written by Martin Maturine, AIGDC	Liability issues; coverage issues; defense strategy; communication with defense counsel	X	X			b. d. f.

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No.	Date	Description	Subject Matter	Attorney Client Privilege	Work Product	Joint Defense	Other	Deficiency of Defendants' Objection <sup>1</sup>
236.	5/27/04	Excess Claim Note written by Martin Maturine, AIGDC	Coverage issues; defense strategy; communication with insured's coverage counsel		X	X		c. d. f.
237.	5/25/04	Excess Claim Note written by Martin Maturine, AIGDC	Defense strategy; liability issues; communication with defense counsel		X	X		c. d. f.
238.	5/25/04	Excess Claim Note written by Martin Maturine, AIGDC	Coverage issues; defense strategy; communication with insured's coverage counsel; communication with coverage counsel		X	X		c. d. f.
239.	5/19/04	Excess Claim Note written by Martin Maturine, AIGDC	Defense strategy; coverage issues; communication with defense counsel; communication with coverage counsel	X	X			b. d. f.
240.	5/18/04	Excess Claim Note written by Martin Maturine, AIGDC	Coverage issues; communication with coverage counsel	X	X			b. c. d. f.
241.	5/18/04	Excess Claim Note written by Martin Maturine, AIGDC	Coverage issues; communication with coverage counsel	X	X			b. c. d. f.

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242.	5/18/04	Excess Claim Note written by Martin Maturine, AIGDC	Defense strategy; damages issues; communication with defense counsel	X	X			b. c. d. f.
243.	5/14/04	Excess Claim Note written by Martin Maturine, AIGDC	Coverage issues; communication with coverage counsel	X	X			b. c. d. f.
244.	5/13/04	Excess Claim Note written by Martin Maturine, AIGDC	Liability issues; communication with defense counsel	X	X			b. c. d. f.
245.	5/12/04	Excess Claim Note written by Martin Maturine, AIGDC	Liability issues; defense strategy; communication with defense counsel	X	X			b. d. f.
246.	4/30/04	Excess Claim Note written by Martin Maturine, AIGDC	Coverage issues; communication with coverage counsel	X	X			b. c. d. f.
247.	4/30/04	Excess Claim Note written by Martin Maturine, AIGDC	Coverage issues; defense strategy; communication with defense counsel	X	X			b. c. d. f.
248.	4/21/04	Excess Claim Note written by Martin Maturine, AIGDC	Coverage issues; communication with coverage counsel	X	X			b. c. d. f.



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249.	4/19/04	Excess Claim Note written by Martin Maturine, AIGDC	Coverage issues; defense strategy; communication with defense counsel; communication with coverage counsel	X	X			b. c. d. f.
250.	4/16/04	Excess Claim Note written by Martin Maturine, AIGDC	Coverage issues; defense strategy; communication with defense counsel	X	X			b. c. d. f.
251.	4/13/04	Excess Claim Note written by Martin Maturine, AIGDC	Defense strategy; communication with defense counsel	X	X			b. d. f.
252.	4/6/04	Excess Claim Note written by Martin Maturine, AIGDC	Defense strategy; coverage issues; communication with Crawford		X	X		c. d. f.
253.	4/5/04	Excess Claim Note written by Martin Maturine, AIGDC	Defense strategy; liability issues		X			c. d. f.
254.	4/5/04	Excess Claim Note written by Martin Maturine, AIGDC	Coverage issues; communication with Zurich; communication with defense counsel		X	X		c. d. f.
255.	4/2/04	Excess Claim Note written by Martin Maturine, AIGDC	Coverage issues; communication with Zurich		X	X		c. d. f.

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256.	3/31/04	Excess Claim Note written by Martin Maturine, AIGDC	Coverage issues; communication with Zurich		X	X		c. d. f.
257.	4/5/04	Excess Claim Note written by Richard Mastronardo, AIGDC	Coverage issues; defense strategy		X			c. d. f.
258.	10/20/03	Claim Evaluation Worksheet Prepared by Nixon Peabody [bate stamped 1573-76]	Analysis of liability and damages		X	X		d. f.
259.	4/19/04	Excess Claim Digest [redacted version produced; bate stamp 1704]	Reserve information		X		X (Relevance)	c. d. f. (Clearly Relevant)