

EXHIBIT A

LAW OFFICES OF MARC TOBEROFF

A PROFESSIONAL CORPORATION

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LOS ANGELES, CALIFORNIA 90067

MARC TOBEROFF
NICHOLAS C. WILLIAMSON
* ALSO ADMITTED IN NEW YORK

TELEPHONE
(310) 246-3333

FACSIMILE
(310) 246-3101

October 23, 2006

Via Facsimile and US Mail

James Weinberger, Esq.
Fross Zelnick Lehrman & Zissu, P.C.
866 United Nations Plaza
New York, New York 10017

Re: Superman/Superboy Litigations, Case Nos. 04-CV-8400, 04-CV-8776 RSWL (RZx)

Dear James:

Enclosed please find the privilege log for Don Bulson's files.

Very truly yours,



Marc Toberoff

cc: Michael Bergman, Esq. (via facsimile)
Patrick Perkins, Esq. (via facsimile)

Exhibit "A"

PRIVILEGE LOG

Log #	Date of Document	Identity of Recipient(s)	Identity of Author(s)	Document Description	Privilege Claim	Present Location
1	7/18/1997	Michael Siegel	Atty Himanshu Amin	Letter	Atty/Client	Plaintiffs' Counsel
2	8/7/1997	Atty Himanshu Amin	Atty Arthur Levine	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
3	8/15/1997		Atty Don Bulson	Notes	Atty Work Product	Plaintiffs' Counsel
4	10/14/1997	Atty Dennis Larson	Atty Himanshu Amin	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
5	11/5/1997	Atty Himanshu Amin	Atty Dennis Larson	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
6	11/12/1997	Michael Siegel	Atty Himanshu Amin	Letter	Atty/Client	Plaintiffs' Counsel
7	1/15/1998	Atty Arthur Levine	Atty Don Bulson	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
8	2/2/1998	Atty Don Bulson	Atty Arthur Levine	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
9	3/18/1998	Atty Arthur Levine	Atty Don Bulson	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
10	6/17/1998	Atty Arthur Levine	Atty Don Bulson	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
11	6/26/1998	Atty Don Bulson	Atty Arthur Levine	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
12	6/26/1998	Atty Don Bulson	Atty Arthur Levine	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel

13	9/4/1998		Atty Don Bulson	Letter(draft)	Atty Work Product	Plaintiffs' Counsel
14	11/3/1998	Atty Arthur Levine	Atty Don Bulson	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
15	11/13/1998	Atty Don Bulson	Atty Arthur Levine	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
16	12/4/1998	Atty Don Bulson	Atty Arthur Levine	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
17	12/14/1998	Atty Don Bulson	Atty Don Bulson	Notes	Atty Work Product	Plaintiffs' Counsel
18	12/28/1998	Atty Don Bulson	Atty Vinay Joshi	Memorandum	Atty Work Product	Plaintiffs' Counsel
19	1/19/1999	Atty Arthur Levine	Atty Don Bulson	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
20	3/31/1999	Atty Don Bulson	Atty Arthur Levine	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
21	3/10/1999	Atty Arthur Levine	Atty Don Bulson	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
22	3/17/1999	Atty Don Bulson	Atty Arthur Levine	Faxsimile	Atty/Client-Joint Interest	Plaintiffs' Counsel
23	4/15/1999	Atty Arthur Levine	Atty Don Bulson	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
24	6/8/1999	Atty Arthur Levine	Atty Don Bulson	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
25	6/9/1999	Atty Don Bulson	Atty Arthur Levine	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
26	6/9/1999	Atty Don Bulson	Atty Arthur Levine	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel

					Memorandum	Atty/Client-Joint Interest	Plaintiffs' Counsel
27	7/12/1999	Atty Arthur Levine, Atty Don Bulson	Atty Kevin Marks				
28	7/20/1999	Atty Arthur Levine	Atty Don Bulson	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel	
29	8/2/1999	Atty Don Bulson	Atty Arthur Levine	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel	
30	8/10/1999	Atty Arthur Levine	Atty Don Bulson	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel	
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32	9/21/1999	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel	
33	9/21/1999	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel	
34	9/21/1999	Atty Arthur Levine	Atty Don Bulson	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel	
35	9/3/1999	Atty Don Bulson	Notes	Atty Work Product	Plaintiffs' Counsel		
36	9/5/1999	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel	
37	9/7/1999	Atty Don Bulson	Notes	Atty/Work Product	Plaintiffs' Counsel		
38	9/8/1999	Atty Arthur Levine	Atty Don Bulson	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel	
39	9/9/1999	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel	
40	9/9/1999	Atty Arthur Levine		Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel	

41	9/14/1999	Michael Siegel	Atty Don Bulson	Letter	Atty/Client	Plaintiffs' Counsel
42	9/14/1999	Atty Kevin Marks	Atty Don Bulson	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
43	9/16/1999		Atty Don Bulson	Notes	Atty Work Product	Plaintiffs' Counsel
44	9/17/1999		Atty Arthur Levine	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
45	9/17/1999	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
46	9/20/1999	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
47	9/22/1999	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
48	9/22/1999	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
49	9/22/1999	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
50	9/23/1999	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
51	9/23/1999	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
52	9/23/1999		Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
53	9/24/1999	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
54	9/24/1999	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel

55	9/27/1999	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
56	9/28/1999	Atty Kevin Marks	Atty Don Bulson	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
57	9/28/1999	Jeanne & Laura Siegel; Atty Dennis Larson; Atty Arthur Levine; Atty Don Bulson	Atty Kevin Marks	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
58	9/29/1999	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
59	10/8/1999	Atty Don Bulson	Atty Kevin Marks	Letter	Atty/Client- Joint Interest	Plaintiffs' Counsel
60	10/8/1999	Atty Kevin Marks	Atty Don Bulson	Letter	Atty/Client- Joint Interest	Plaintiffs' Counsel
61	10/11/1999	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
62	10/11/1999	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
63	10/11/1999	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
64	10/11/1999	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
65	10/12/1999	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
66		Atty Don Bulson	Notes	Atty Work Product	Plaintiffs' Counsel	
67	10/27/1999	Atty Kevin Marks	Atty Don Bulson	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
68	10/31/1999	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel

69	11/3/1999	Joanne & Laura Siegel; Atty Dennis Larson; Atty Bruce Ramer; Atty Arthur Levine; Atty Dan Bulson	Atty Kevin Marks	Letter	Atty/Client/Joint Interest Plaintiffs' Counsel
70	11/3/1999		Atty Don Bulson	Notes	Atty Work Product Plaintiffs' Counsel
71	11/4/1999	Michael Siegel	Atty Don Bulson	Email	Atty/Client Plaintiffs' Counsel
72	11/5/1999		Atty Don Bulson	Notes	Atty Work Product Plaintiffs' Counsel
73	11/8/1999	Atty Kevin Marks	Atty Don Bulson	Letter	Atty/Client-Joint Interest Plaintiffs' Counsel
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77	12/8/1999	Michael Siegel	Atty Don Bulson	Letter	Atty/Client Plaintiffs' Counsel
78	12/10/1999	Joanne & Laura Siegel, Atty Don Bulson, Atty Arthur Levine	Atty Kevin Marks	Letter	Atty/Client-Joint Interest Plaintiffs' Counsel
79	12/22/1999	Atty Don Bulson	Atty Kevin Marks	Email	Atty/Client-Joint Interest Plaintiffs' Counsel
80	12/22/1999	Atty Kevin Marks	Atty Don Bulson	Email	Atty/Client-Joint Interest Plaintiffs' Counsel
81	12/22/1999	Atty Kevin Marks	Atty Don Bulson	Email	Atty/Client-Joint Interest Plaintiffs' Counsel

82	12/22/1999	Atty Kevin Marks	Atty Don Bulson	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
83	12/29/1999	Atty Don Bulson	Atty Kevin Marks	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
84	12/29/1999	Atty Don Bulson	Atty Kevin Marks	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
85	12/30/1999	Atty Kevin Marks	Atty Don Bulson	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
86	1/2/2000	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
87	1/3/2000	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
88	1/3/2000	Atty Kevin Marks	Atty Don Bulson	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
89	1/3/2000	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
90	1/3/2000	Atty Kevin Marks	Atty Don Bulson	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
91	1/4/2000	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
92	1/4/2000	Atty Don Bulson	Atty Kevin Marks	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
93	1/5/2000	Atty Don Bulson	Atty Kevin Marks	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
94	1/10/2000	Atty Don Bulson	Atty Kevin Marks	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
95	1/10/2000	Atty Don Bulson	Atty Kevin Marks	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel

96	1/10/2000	Atty Don Bulson	Atty Kevin Marks	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
97	1/11/2000	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
98	1/14/2000	Atty Don Bulson	Atty Kevin Marks	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
99	1/17/2000	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
100	1/18/2000	Atty Don Bulson	Atty Kevin Marks	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
101	2/14/2000	Atty Don Bulson	Atty Kevin Marks	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
102	2/28/2000	Joanne & Laura Siegel; Atty Arthur Levine; Atty Bruce Ramer; Atty Don Bulson	Atty Don Bulson	Notes	Atty/Client-Joint Interest	Plaintiffs' Counsel
103	3/1/2000	Atty Kevin Marks	Atty Kevin Marks	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
104	3/7/2000	Atty Kevin Marks	Atty Don Bulson	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
105	3/8/2000	Joanne & Laura Siegel; Atty Arthur Levine; Atty Don Bulson	Atty Kevin Marks	Letter	Atty/Client	Plaintiffs' Counsel
106	3/9/2000	Atty Don Bulson	Atty Kevin Marks	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
107	3/9/2000	Atty Don Bulson	Atty Kevin Marks	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
108	3/13/2000	Michael Siegel	Atty Don Bulson	Letter	Atty/Client	Plaintiffs' Counsel
109	3/21/2000	Atty Don Bulson	Atty Kevin Marks	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel

110	3/30/2000	Joanne & Laura Siegel; Atty Bruce Ramer; Atty Don Bulson; Atty Arthur Levine	Atty Kevin Marks	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
111	3/30/2000	Joanne & Laura Siegel; Atty Don Bulson	Atty Kevin Marks	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
112	4/3/2000	Joanne & Laura Siegel; Atty Don Bulson; Atty Arthur Levine	Atty Kevin Marks	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
113	4/5/2000		Atty Don Bulson	Notes	Atty Work Product	Plaintiffs' Counsel
114	4/5/2000	Joanne & Laura Siegel; Atty Don Bulson; Atty Arthur Levine	Atty Kevin Marks	Fax/call	Atty/Client-Joint Interest	Plaintiffs' Counsel
115	4/11/2000	Joanne & Laura Siegel; Atty Don Bulson; Atty Arthur Levine	Atty Kevin Marks	Fax/call	Atty/Client-Joint Interest	Plaintiffs' Counsel
116	4/12/2000	Atty Kevin Marks	Atty Don Bulson	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
117	4/12/2000	Atty Don Bulson	Atty Kevin Marks	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
118	4/17/2000	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
119	4/17/2000	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
120	4/17/2000	Atty Don Bulson	Atty Kevin Marks	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
121	4/17/2000	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
122	4/18/2000	Atty Don Bulson	Atty Kevin Marks	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
123	4/18/2000	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel

124	5/21/2000	Atty Don Bulson	Atty Kevin Marks	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
125	5/3/2000	Atty Kevin Marks	Atty Don Bulson	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
126	5/3/2000	Atty Don Bulson	Atty Kevin Marks	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
127	5/4/2000	Atty Kevin Marks	Atty Don Bulson	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
128	5/4/2000	Atty Don Bulson	Atty Kevin Marks	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
129	5/5/2000	Atty Kevin Marks	Atty Don Bulson	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
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131	5/8/2000	Atty Don Bulson	Atty Kevin Marks	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
132	5/8/2000	Atty Kevin Marks	Atty Don Bulson	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
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137	5/26/2000	Atty Don Bulson	Atty Kevin Marks	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel

					Notes	Atty Work Product	Plaintiffs' Counsel
138	5/30/2000		Atty Don Bulson				
139	6/5/2000	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel	
140	6/7/2000	Atty Don Bulson	Atty Kevin Marks	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel	
141	6/9/2000	Joanne & Laura Siegel; Atty Don Bulson	Atty Kevin Marks	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel	
142	6/27/2000	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel	
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146	7/10/2000	Atty Kevin Marks	Atty Don Bulson	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel	
147	7/10/2000	Atty Kevin Marks	Atty Don Bulson	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel	
148	7/14/2000	Atty Don Bulson	Atty Don Bulson	Notes	Atty Work Product	Plaintiffs' Counsel	
149	7/14/2000	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel		
150	7/17/2000	Atty Don Bulson	Atty Kevin Marks	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel	
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152	7/17/2000	Joanne & Laura Siegel; Atty Bruce Ramer; Atty Don Bulson	Atty Kevin Marks	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
153	7/18/2000	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
154	7/18/2000	Atty Don Bulson	Atty Kevin Marks	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
155	7/18/2000	Atty Kevin Marks	Atty Don Bulson	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
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162	7/24/2000	Atty Kevin Marks	Atty Don Bulson	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
163	7/24/2000	Michael Siegel	Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
164	7/25/2000	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
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166	7/26/2000	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
167	7/26/2000	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
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169	8/7/2000	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
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171	8/8/2000	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
172	8/8/2003	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
173	8/10/2003	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
174	8/21/2000	Atty Don Bulson	Notes	Atty Work Product	Plaintiffs' Counsel	
175		Atty Don Bulson	Notes	Atty Work Product	Plaintiffs' Counsel	
176	8/25/2000	Michael Siegel	Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
177	9/5/2000	Atty Don Bulson	Letter(draft)	Atty Work Product	Plaintiffs' Counsel	
178	9/6/2000	Atty Kevin Marks	Atty Don Bulson	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
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183	9/17/2000	Atty Don Bulson	Atty Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
184	9/17/2000	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
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194	1/12/2000	Atty Don Bulson	Michael Siegel	Letter	Atty/Client	Plaintiffs' Counsel
195	1/24/2000	Atty Don Bulson	Michael Siegel	Letter	Atty/Client	Plaintiffs' Counsel
196	1/24/2000	Michael Siegel	Atty Don Bulson	Email	Atty/Cient	Plaintiffs' Counsel
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203	1/31/2001	Michael Siegel	Atty Don Bulson	Email	Atty/Cient	Plaintiffs' Counsel
204	2/16/2001	Michael Siegel	Atty Don Bulson	Letter	Atty/Cient	Plaintiffs' Counsel
205	3/9/2001	Michael Siegel	Atty Don Bulson	Email	Atty/Cient	Plaintiffs' Counsel
206	3/12/2001	Atty Kevin Marks	Atty Don Bulson	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
207	4/30/2001	Atty Kevin Marks	Atty Kevin Marks	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel

208	5/4/2001	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
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216	7/30/2001	Atty Don Bulson	Atty Kevin Marks	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
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218	7/31/2001	Michael Siegel	Atty Don Bulson	Letter	Atty/Client	Plaintiffs' Counsel
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222	8/30/2001	Atty Don Bulson	Atty Kevin Marks	Facsimile	Atty/Client-Joint Interest	Plaintiffs' Counsel	
223	9/12/2001	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel	
224	9/13/2001	Atty Kevin Marks	Atty Don Bulson	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel	
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228	10/17/2001	Atty Don Bulson	Atty Kevin Marks	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel	
229	10/17/2001	Atty Don Bulson	Atty Kevin Marks	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel	
230	10/19/2001	Laura Siegel & Atty Don Bulson	Atty Kevin Marks	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel	
231	10/19/2001	Laura Siegel & Atty Don Bulson	Atty Kevin Marks	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel	
232	10/19/2001	Atty Don Bulson	Atty Kevin Marks	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel	
233	10/24/2001	Michael Siegel	Atty Don Bulson	Letter	Atty/Client	Plaintiffs' Counsel	
234	11/27/2001	Atty Don Bulson	Notes	Atty Work Product	Plaintiffs' Counsel		
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236	12/18/2001	Atty Don Bulson	Atty Kevin Marks	Letter	Atty/Client/Joint Interest	Plaintiffs' Counsel	
237	12/26/2001	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel	
238	1/3/2002	Atty Kevin Marks	Atty Don Bulson	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel	
239	1/3/2002	Atty Kevin Marks	Atty Don Bulson	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel	
240	1/3/2002	Atty Don Bulson	Atty Kevin Marks	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel	
241	1/10/2002	Atty Don Bulson	Atty Kevin Marks	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel	
242	1/12/2002	Atty Don Bulson	Atty Kevin Marks	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel	
243	2/5/2002	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel	
244	2/6/2002	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel	
245	2/7/2002	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel	
246	2/8/2002	Atty Don Bulson	Atty Kevin Marks	Memorandum	Atty Work Product-Joint Interest	Plaintiffs' Counsel	
247	3/2/2002	Atty Don Bulson	Notes	Atty Work Product	Plaintiffs' Counsel		
248	3/8/2002	Atty Don Bulson	Notes	Atty Work Product	Plaintiffs' Counsel		
249	4/7/2002	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel	

250	4/8/2002	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
251	5/9/2002	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
252	5/10/2002	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
253	5/10/2002	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
254	5/10/2002	Atty Kevin Marks & Michael Siegel	Atty Don Bulson	Letter	Atty/Client/Joint Interest	Plaintiffs' Counsel
255	5/10/2002	Atty Kevin Marks	Atty Don Bulson	Letter	Atty/Client/Joint Interest	Plaintiffs' Counsel
256	5/12/2002	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
257	5/12/2002	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
258	7/13/2002	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
259	8/13/2002	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
260	8/14/2002	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
261	8/14/2002	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
262	8/23/2002	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
263	8/27/2002	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel

264	8/28/2002	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
265	9/2/2002	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
266	9/2/2002	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
267	9/3/2002	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
268	9/4/2002	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
269	9/19/2002	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
270	9/19/2002	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
271	9/22/2002	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
272	9/23/2002	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
273	9/23/2002	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
274	9/24/2002	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
275	9/24/2002	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
276	9/24/2002	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
277	9/28/2002	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel

278	9/28/2002	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
279	10/1/2002	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
280	10/1/2002	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
281	11/8/2002	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
282	11/19/2002	Atty Don Bulson	Atty Don Bulson	Notes	Atty Work Product	Plaintiffs' Counsel
283	11/25/2002	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
284	11/27/2002	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
285	12/19/2002	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
286	1/16/2003	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
287	1/23/2003	Atty Don Bulson	Notes	Atty Work Product	Plaintiffs' Counsel	Plaintiffs' Counsel
288	1/23/2003	Atty Don Bulson	Notes	Atty Work Product	Plaintiffs' Counsel	Plaintiffs' Counsel
289	1/24/2003	Atty Don Bulson	Notes	Atty Work Product		
290	1/28/2003	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
291	3/24/2003	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel

292	4/2/2003	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
293	4/2/2003	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
294	4/4/2003	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
295	4/7/2003	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
296	4/7/2003	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
297	4/14/2003	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
298	4/14/2003	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
299	4/16/2003	Atty Don Bulson	Joanne & Laura Siegel	Letter	Atty/Client/Joint Interest	Plaintiffs' Counsel
300	4/16/2003	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
301	4/30/2003	Atty Don Bulson	Atty Marc Taboroff	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
302	5/6/2003	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
303	5/6/2003	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
304	5/7/2003	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
305	5/8/2003	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel

306	5/6/2003	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
307	5/12/2003	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
308	5/12/2003	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
309	5/12/2003	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
310	5/27/2003	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
311	5/27/2003	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
312	5/29/2003	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
313	6/3/2003	Atty Don Bulson	Notes	Atty/Client-Joint Interest	Plaintiffs' Counsel	
314	6/9/2003	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
315	6/10/2003	Atty Don Bulson	Notes	Atty Work Product	Plaintiffs' Counsel	
316	6/13/2003	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
317	6/17/2003	Atty Don Bulson	Letter(draft)	Atty Work Product	Plaintiffs' Counsel	
318	6/18/2003	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
319	6/18/2003	Atty Marc Taberoff	Atty Don Bulson	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel

320	6/19/2003	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
321	6/23/2003	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
322	7/14/2003	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
323	7/14/2003	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
324	7/14/2003	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
325	7/16/2003	Atty Don Bulson	Atty Marc Toberoff	Faxsimile	Atty/Client-Joint Interest	Plaintiffs' Counsel
326	7/21/2003	Atty Don Bulson	Notes	Atty/Client-Joint Interest	Plaintiffs' Counsel	
327	8/5/2003	Atty Don Bulson	Atty Marc Toberoff	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
328	8/6/2003	Atty Don Bulson	Atty Marc Toberoff	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
329	8/12/2003	Atty Don Bulson	Letter(draft)	Atty Work Product	Plaintiffs' Counsel	
330	9/17/2003	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
331	9/17/2003	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
332	9/17/2003	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
333	9/17/2003	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel

334	10/22/2003	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
335	10/22/2003	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
336	10/23/2003	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
337	10/27/2003	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
338	10/28/2003	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
339	11/13/2003	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
340	11/13/2003	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
341	1/11/2004	Atty Don Bulson	Notes	Atty Work Product	Plaintiffs' Counsel	
342	5/11/2004	Atty Don Bulson	Notes	Atty Work Product	Plaintiffs' Counsel	
343	5/11/2004	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
344	6/3/2004	Atty Don Bulson	Notes	Atty Work Product	Plaintiffs' Counsel	
345	6/7/2004	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
346	6/7/2004	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
347	6/7/2004	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel

348	6/8/2004	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
349	6/9/2004		Atty Don Bulson	Notes	Atty Work Product	Plaintiffs' Counsel
350	6/10/2004	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
351	6/15/2004	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
352	6/17/2004	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
353	6/21/2004	Michael Siegel	Atty Don Bulson	Email	Atty/Clien	Plaintiffs' Counsel
354	6/21/2004	Atty Don Bulson	Michael Siegel	Email	Atty/Clien	Plaintiffs' Counsel
355	6/21/2004	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
356	6/24/2004	Atty Kevin Marks	Atty Don Bulson	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
357	6/27/2004	Atty Don Bulson	Atty Kevin Marks	Email	Atty/Clien	Plaintiffs' Counsel
358	7/27/2004	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
359	7/27/2004	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
360	7/28/2004	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
361	8/4/2004	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel

362	8/5/2004	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
363	8/9/2004	Atty Marc Toboroff	Atty Don Bulson	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
364	8/18/2004	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
365	8/19/2004	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
366	8/22/2004	Kevin Marks	Atty Don Bulson	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
367	8/22/2004	Kevin Marks	Atty Don Bulson	Letter	Atty/Client-Joint Interest	Plaintiffs' Counsel
368	10/5/2004	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
369	10/5/2004	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
370	10/6/2004	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
371	10/6/2004	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
372	10/10/2004	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
373	10/12/2004	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
374	10/12/2004	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
375	10/12/2004	Atty Marc Toboroff	Atty Don Bulson	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel

				Notes	Atty Work Product	Plaintiffs' Counsel
376	10/13/2004	Atty Don Bulson	Atty Work Product	Atty Work Product	Plaintiffs' Counsel	
377	11/12/2004	Atty Marc Tobroff	Atty Don Bulson	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
378	11/12/2004	Atty Marc Tobroff	Atty Don Bulson	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
379	11/17/2004	Atty Don Bulson	Atty Marc Tobroff	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
380	11/17/2004	Atty Don Bulson	Atty Marc Tobroff	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
381	11/18/2004	Atty Don Bulson	Atty Marc Tobroff	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
382	11/18/2004	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
383	11/19/2004	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
384	11/19/2004	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
385	11/19/2004	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
386	11/24/2004	Atty Marc Tobroff	Atty Don Bulson	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
387	11/28/2004	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
388	11/29/2004	Atty Don Bulson	Atty Marc Tobroff	Email	Atty/Client-Joint Interest	Plaintiffs' Counsel
389	12/12/2004	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel

390	12/5/2004	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
391	12/6/2004	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
392	12/7/2004	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
393	1/17/2005	Atty Don Bulson	Atty Marc Tobroff	Email	Atty/Client/John Interest	Plaintiffs' Counsel
394	2/4/2005	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
395	2/4/2005	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
396	2/5/2005	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
397	2/5/2005	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
398	2/5/2005	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
399	2/6/2005	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel
400	2/17/2005	Atty Don Bulson	Notes	Atty Work Product	Plaintiffs' Counsel	
401	2/20/2005	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
402	2/28/2005	Michael Siegel	Atty Don Bulson	Email	Atty/Client	Plaintiffs' Counsel
403	10/3/2005	Atty Don Bulson	Michael Siegel	Email	Atty/Client	Plaintiffs' Counsel

404	10/10/2005	Michael Siegel	Atty/Client	Plaintiffs' Counsel
405	10/11/2005	Atty Don Bulson	Michael Siegel	Email
406	10/11/2005	Atty Don Bulson	Michael Siegel	Email
407	10/24/2005	Michael Siegel	Atty/Client	Plaintiffs' Counsel
408	10/24/2005	Atty Don Bulson	Atty/Client	Plaintiffs' Counsel
409	10/24/2005	Atty Don Bulson	Michael Siegel	Email
410	10/25/2005	Atty Don Bulson	Michael Siegel	Email
411	10/31/2005	Atty Don Bulson	Atty/Client	Plaintiffs' Counsel
412	11/18/2005	Atty Marc Toboroff	Atty/Client/Joint Interest	Plaintiffs' Counsel
413	00/00/0000	Atty Don Bulson	Notes	Atty Work Product
414	00/00/0000	Atty Don Bulson	Notes	Atty Work Product
415	00/00/0000	Atty Don Bulson	Notes	Atty Work Product
416	00/00/0000	Atty Don Bulson	Notes	Atty Work Product
417	00/00/0000	Atty Don Bulson	Notes	Atty Work Product

418	000000	Atty Don Bulson	Notes	Atty Work Product	Plaintiffs' Counsel
419	00/0000	Atty Don Bulson	Notes	Atty Work Product	Plaintiffs' Counsel
420	000000	Atty Don Bulson	Notes	Atty Work Product	Plaintiffs' Counsel
421	00/0000	Atty Don Bulson	Notes	Atty Work Product	Plaintiffs' Counsel
422	000000	Atty Don Bulson	Notes	Atty Work Product	Plaintiffs' Counsel

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

IN RE: SUBPOENA DUCES TECUM)	Case No.: 1:06 MC 99
ISSUED BY THE U.S. DISTRICT)	
COURT FOR THE NORTHERN)	
DISTRICT OF Ohio in:)	Case Nos. SA CV 04-8400 SJO (RZx)
	SA CV 04-8776 SJO (RZx)
JOANNE SIEGEL, <i>et al.</i> ,)	
	JUDGE SOLOMON OLIVER, JR.
Plaintiffs)	
)
v.))
WARNER BROS. ENTERTAINMENT))
INC.,))
)
Defendant)	<u>AMENDED ORDER</u>

Movants Warner Bros. Entertainment Inc., Time Warner Inc., Warner Communications, Inc., Warner Bros. Television Production Inc., and Defendant-Counterclaimant DC Comics (collectively, "Movants"), by and through counsel, hereby move the court pursuant to Fed. R. Civ. P. 45: (1) for an order compelling Cleveland, Ohio resident Don Bulson, Esq. ("Bulson") to produce documents responsive to a subpoena duces tecum issued by the U.S. District Court for the Northern District of Ohio in the above-captioned actions; (2) to compel such production without regard to the attorney-client privilege; (3) to appear for deposition in accordance with the subpoena; and (4) to award to Movants their cost and attorneys' fees incurred in making this Motion.

Movants are Defendants in two complex actions pending in the U.S. District Court for the Central District of California relating to, *inter alia*, copyrights in certain Superman literary works. Movants served their subpoena on Don Bulson, a resident of Cleveland, who was counsel for

Exhibit "B"

Michael Siegel, the deceased son of Jerry Siegel, one of the co-creators of Superman. Plaintiffs in the two actions in California, Joanne Siegel and her daughter, Laura Siegel Larson, are respectively the widow and daughter of Jerry Siegel, who, along with Joseph Schuster, created the first Superman comic story, published in 1938. One California action arises out of a purported termination of the rights of the Warner Bros. Defendants relating to literary works featuring the Superman character. Jerry Siegel's share relative to the grants by Jerry Siegel and Schuster is proportionally owned as follows: 50% by Joanne Siegel; 25% by Laurel Siegel Larson and 25% by Michael Siegel, Jerry Siegel's son from his first marriage. The second California action involves a notice of termination relating only to comics featuring Super Boy, in which only Jerry Siegel held the copyright. His wife, daughter and son hold proportionate interests in the same percentages that they hold in respect to his rights to Superman.

The court has held two hearings in regard to the Motion to Compel by Movants, the latest of which was on February 1, 2008. Because motions for summary judgment have been filed in both actions, Bulson argues that further discovery is inappropriate. Movant argues that further discovery is appropriate and may be useful in the underlying actions. After reviewing all of the submissions of the parties and hearing their arguments, the court hereby rules as indicated herein.

The court denies the Motion to Compel Production Without Regard to Attorney Client Privilege because the court finds that the submission of the privileged log was not so delayed as to effect a waiver. The court also finds that the award of attorney fees to Movants is not appropriate because their document request to Mr. Bulson, attorney for deceased Michael Siegel, was extremely broad and covered large numbers of documents, and because it could be anticipated that some of these documents would be covered by the attorney client privilege. It was also likely that the court

might have to determine whether the privilege was applicable. The court finds that Movants may be entitled to the documents set forth at Page 8 of their Reply Brief.

Mr. Bulson must submit a revised privilege log by February 11, 2008. That revised log shall relate to only the 15 communications set forth on page 8 of the Movant's Reply Memorandum in Support of Their Motion to Compel. The description portion of the log shall be revised to give sufficient detail so that Movants can determine whether they have a basis for objecting to the assertion of the attorney-client privilege based on a joint interest. On or before February 19, 2008, Movants must determine whether they still wish to pursue all or some of these documents. If the parties have any resulting differences after that time, Movants shall notify this court by February 20, 2008. Thereafter, the court will review the documents in dispute and determine whether the documents are covered by the attorney-client privilege. To save time, Mr. Bulford shall submit the 15 documents to the court by February 19, 2008, so the court will be prepared to review them *in camera*. The court further held at the conference with counsel for the parties that Mr. Bulford must be deposed by March 3, 2008, at a time that is convenient to all relevant parties.

IT IS SO ORDERED.

/s/ SOLOMON OLIVER, JR.
UNITED STATES DISTRICT JUDGE

February 5, 2008

EXHIBIT C

Feb-11-08 06:49pm From-

T-771 P.002/008 F-806

LAW OFFICES OF MARC TOBEROFF

A PROFESSIONAL CORPORATION

2049 CENTURY PARK EAST, SUITE 2720

LOS ANGELES, CALIFORNIA 90067

MARC TOBEROFF
 NICHOLAS C. WILLIAMSON
 KEITH G. ADAMS
 JEFFREY R. RHoads

* ALSO ADMITTED IN NEW YORK

TELEPHONE
 (310) 248-3333FACSIMILE
 (310) 248-3101

February 11, 2008

Via Facsimile and US Mail

Roger L. Zissu, Esq.
 James D. Weinberger, Esq.
 Fross Zelnick Lehrman & Zissu, P.C.
 866 United Nations Plaza
 New York, NY 10017

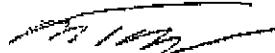
David A. Kutik, Esq.
 Meggan A. Rawlin, Esq.
 Jones Day
 North Point
 901 Lakeside Drive
 Cleveland, Ohio 44114-1190

Re: In Re: Subpoena Duces Tecum- Misc. Case No. 00099-SO

Dear Counsel:

Pursuant to Judge Oliver's February 5, 2008 discovery order, enclosed please find respondent Don Bulson's revised privilege log regarding the documents listed on page 8 of the movant's Reply Memorandum filed November 20, 2006. Please note entry 412 was originally listed as being dated "11/18/05"; this was a typographical error. The correct date of the document is "11/18/04" and has been corrected in the revised log.

Very truly yours,



Marc Toberoff

cc: Michael Bergman, Esq. (via Facsimile)
 Patrick Perkins, Esq. (via Facsimile)

Exhibit "C"

Feb-11-08 06:49pm From-

T-771 P.003/008 F-805

REVISED PRIVILEGE LOG

Log #	Date of Document	Identity of Recipient(s)	Identity of Author(s)	Document Description	Privilege Claim	Present Location
299	4/10/2003	Atty Don Bulson	Joanne & Laura Siegel	Letter discussing accounting issues as they relate to Michael Siegel re: U.S.C. § 304(c) termination regarding Jerome Siegel's "Superman" copyright	Atty/Client-Joint Interest	Plaintiffs' Counsel
301	4/30/2003	Atty Don Bulson	Atty Marc Toberoff	Letter discussing Warner Bros.' settlement offers and the risks of litigation re: Joanne & Laura Siegel's 17 U.S.C. § 304(c) termination regarding Jerome Siegel's "Superman" copyright	Atty/Client-Joint Interest	Plaintiffs' Counsel
319	5/13/2003	Atty Marc Toberoff	Atty Don Bulson	Facsimile discussing accounting issues as they relate to Michael Siegel re: Joanne & Laura Siegel's 17 U.S.C. § 304(c) termination regarding Jerome Siegel's "Superman" copyright	Atty/Client-Joint Interest	Plaintiffs' Counsel
325	7/16/2003	Atty Don Bulson	Atty Marc Toberoff	Facsimile discussing accounting issues as they relate to Michael Siegel re: Joanne & Laura Siegel's 17 U.S.C. § 304(c) termination regarding Jerome Siegel's "Superman" copyright	Atty/Client-Joint Interest	Plaintiffs' Counsel

Feb-11-08 06:50pm From-

T-771 P.004/008 F-805

327	8/6/2003	Atty Don Bulson	Atty Marc Toberoff	Atty/Client-Joint Interest Plaintiffs' Counsel
328	8/6/2003	Atty Don Bulson	Atty Marc Toberoff	Atty/Client-Joint Interest Plaintiffs' Counsel
377	11/12/2004	Atty Marc Toberoff	Atty Don Bulson	Atty/Client-Joint Interest Plaintiffs' Counsel

Letter discussing Warner Bros.' settlement offers and the risks of litigation re: Jerome & Laura Siegel's 17 U.S.C. § 304(c) termination regarding Jerome Siegel's "Superman" copyright

Letter discussing Warner Bros.' settlement offers and the risks of litigation re: Jerome & Laura Siegel's 17 U.S.C. § 304(c) termination regarding Jerome Siegel's "Superman" copyright

Feb-11-08 06:50pm From-

T-771 P.005/008 F-805

378	11/12/2004	Atty Marc Toboroff	Atty Don Bulson	Atty/Client-Joint Interest Plaintiffs' Counsel
				Email regarding offer and counteroffers to sell Michael Siegel's termination interest in light of Warner Bros.' settlement offers and the risks of litigation re: Joanne & Laura Siegel's 17 U.S.C. § 304(c) termination regarding Jerome Siegel's "Superman" copyright
379	11/17/2004	Atty Don Bulson	Atty Marc Toboroff	Atty/Client-Joint Interest Plaintiffs' Counsel
				Email discussing Warner Bros.' settlement offers and the risks of litigation re: Joanne & Laura Siegel's 17 U.S.C. § 304(c) termination regarding Jerome Siegel's "Superman" copyright
380	11/17/2004	Atty Don Bulson	Atty Marc Toboroff	Atty/Client-Joint Interest Plaintiffs' Counsel

Feb-11-08 06:50pm From-

T-771 P.006/008 F-805

381	11/18/2004	Atty Don Bulson	Atty Marc Toboroff	Atty/Client-Joint Interest Plaintiffs' Counsel
386	11/24/2004	Atty Marc Toboroff	Atty Don Bulson	Atty/Client-Joint Interest Plaintiffs' Counsel
388	11/29/2004	Atty Don Bulson	Atty Marc Toboroff	Atty/Client-Joint Interest Plaintiffs' Counsel
393	1/17/2005	Atty Don Bulson	Atty Marc Toboroff	Atty/Client-Joint Interest Plaintiffs' Counsel

Email discussing Warner Bros.' settlement offers and the risks of litigation re: Joanne & Laura Siegel's 17 U.S.C. § 304(c) termination regarding Jerome Siegel's "Superman" copyright.

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Atty/Client-Joint Interest Plaintiffs' Counsel

Feb-11-08 06:50pm From-

T-771 P.007/008 F-805

412

11/18/2004

Atty Marc Tobardoff

Atty Dan Bulson

Email discussing Warner Bros.' settlement offers and the risks of litigation re: Joanne & Laura Siegel's 17 U.S.C. § 304(c) termination regarding Jerome Siegel's "Superman" copyright

Atty/Client-Joint Interest Plaintiffs' Counsel

Feb-11-08 06:50pm From-

T-771 P.008/008 F-805

CERTIFICATE OF SERVICE

Respondent Don W. Bulson, Esq., hereby certifies that a copy of the forgoing Revised Privilege Log was served on February 11, 2008 via U.S. Mail and facsimile on the following counsel:

Meggan A. Rawlin, Esq.
Jones Day
North Point
901 Lakeside Avenue
Cleveland, OH 44114
Fax: 216-579-0212

James D. Weinberger, Esq.
Fross Zelnick Lehrman & Zissu, P.C.
866 United Nations Plaza
New York, NY 10017
Fax: 212-813-5901

Patrick T. Perkins
Perkins Law Office, P.C.
1711 Route 9D
Cold Spring, NY 10516
Fax: 845-265-2819

Michael Bergman
Weissman Wolff Bergman Coleman
Grodin & Evall LLP
9665 Wilshire Boulevard, Ninth Floor
Beverly Hills, CA 90212
Fax: 310-550-7191

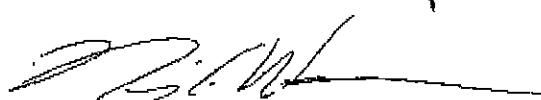

Nicholas C. Williamson
Attorney for Respondent

EXHIBIT D

Case 1:06-mc-00099-SO Document 15 Filed 04/01/2008 Page 1 of 3

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: SUBPOENA DUCES TECUM)	Case No.: 1:06 MC 99
ISSUED BY THE U.S. DISTRICT)	
COURT FOR THE NORTHERN)	
DISTRICT OF Ohio in:)	Case Nos. SA CV 04-8400 SJO (RZx)
)	SA CV 04-8776 SJO (RZx)
JOANNE SIEGEL, <i>et al.</i> ,)	JUDGE SOLOMON OLIVER, JR.
Plaintiffs)	
)	
v.)	
)	
WARNER BROS. ENTERTAINMENT)	
INC.,)	
)	
Defendant)	<u>ORDER</u>

The court takes judicial notice of the fact that the Judge has decided the merits of the claims by the parties in the above-entitled law suits. The court also takes judicial notice that the court has not yet decided the damage-related issues. Previously, Warner Bros. Entertainment Inc., Time Warner Inc., Warner Communications, Inc., Warner Bros. Television Production Inc., and Defendant-Counterclaimant DC Comics (collectively, "Movants"), filed a Motion to Compel Ohio resident Don Bulson, Esq. ("Bulson"), who was counsel for Michael Siegel, the deceased son of Jerry Siegel, to produce documents responsive to a subpoena issued by this District Court in the above-captioned actions and for other pertinent relief. Jerry Siegel, along with Joseph Schuster, created the first Superman comic story, published in 1938. Plaintiffs in the two actions in California, Joanne Siegel and her daughter, Laura Siegel Larson, are respectively the widow and daughter of

Exhibit "D"

Jerry Siegel. One California action arises out of a purported termination of the rights of the Warner Bros. Defendants relating to literary works featuring the Superman character. Jerry Siegel's share relative to the grants by Jerry Siegel and Schuster is proportionally owned as follows: 50% by Joanne Siegel; 25% by Laura Siegel Larson and 25% by Michael Siegel, Jerry Siegel's son from his first marriage. The second California action involves a notice of termination relating only to comics featuring Super Boy, in which only Jerry Siegel held the copyright. His wife, daughter and son hold proportionate interests in the same percentages that they hold in respect to his rights to Superman.

The court, in an Order dated February 5, 2008, denied the Motion to Compel, except in regard to 15 specified documents identified in Movant's Reply Memorandum. The court required the Plaintiffs/Deponents to produce a more detailed privilege log to the Movants and to the court so that the court could make the ultimate determination, if required, regarding whether the documents were subject to the attorney/client privilege. The 15 pieces of correspondence are letters, faxes, and e-mails between Joanne and Laura Siegel and Don Bulson and Attorney Mark Toberoff, counsel for Joanne and Laura Siegel. The Siegels maintain that these communications are subject to the attorney/client joint interest exception. Thus, they argue that communications between counsel for Jerry Siegel and counsel for Joanne and Laura, as well as communications between Joanne and Laura and counsel for Jerry Siegel are privileged. After reviewing all of the 15 documents, and the claimed joint interest privilege which has been asserted, the court finds that none of the 15 documents are subject to the attorney/client privilege based on the joint interest exception. First, the court finds that none of the 15 communications reflected in log numbers 299, 301, 319, 325, 327, 328, 377, 378, 379, 380, 381, 386, 388, 393, and 412 are for the purpose of giving legal advice. Second, the court finds the communications reflected in log numbers 319, 325, 327, 328, 377, 378,

Case 1:06-mc-00099-SO Document 15 Filed 04/01/2008 Page 3 of 3

379, 380, 381, 386, 388, 393, and 412 are not made in regard to a joint and common legal or defense strategy relative to ongoing or upcoming litigation. Finally, the court finds that the interest of Michael Siegel, as reflected in these 13 communications, is separate and apart from those of Joanne and Laura Siegel. These documents relate to the offers back and forth between Mike Toberoff, on behalf of an investor who wishes to purchase Michael Siegel's interest and Bulson on behalf of Michael Siegel. The primary subject does not relate to settlement offers regarding Warner Brothers or the risk of litigation.

Consequently, if Movants are still desirous of pursuing this discovery, the 15 documents discussed above should be immediately turned over to them preparatory to their conducting a deposition of Bulson.

IT IS SO ORDERED.

/s/ SOLOMON OLIVER, JR.
UNITED STATES DISTRICT JUDGE

April 1, 2008

EXHIBIT E

LAW OFFICES
RENNER, OTTO, BOISSELLE & SKLAR, LLP
1621 EUCLID AVENUE, NINETEENTH FLOOR
CLEVELAND, OHIO 44115-2191
TEL: (216) 621-1113 FAX: (216) 621-6165
EMAIL: MAILROOM@RENNEROTTO.COM

June 18, 2003

Via facsimile (1 page)
310-246-3101
No confirmation

Marc Toberoff, Esq.
10th Floor
9701 Wilshire Boulevard
Beverly Hills, CA 90212

Re: Michael Siegel

Dear Marc:

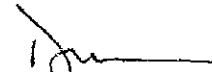
I have discussed with Michael the offer you passed on from a potential investor who is interested in purchasing Michael's interest in the Superman copyright. The amount offered is not acceptable to Michael.

Michael would be willing to entertain an offer that will pay him \$200,000/year for the rest of his life, with a guaranteed minimum of 10 years. This could be structured as a guaranteed annuity or otherwise, with the hope of minimizing taxes while assuring that such payments will be made when due.

Contrary to what I had mentioned during one of our telephone conversations, Michael is 59.

Please let me know if this proposal is of interest to your potential investor.

Very truly yours,



Don W. Bulson

DWB/jam

DB020

Exhibit "E"

AUG-07-2003 00:15PM FFORM

F-028 P-002/003 F-028

**LAW OFFICES OF
MARC TOBEROFF**

August 6, 2003

Via facsimile: (216) 621-6165 and US Mail

Don Bulson, Esq.
Renner, Otto, Boisselle & Sklar, LLP
1621 Euclid Ave., 19th Floor
Cleveland, OH 44115-2191

Re: Michael Siegel

Dear Don:

I had a high-end accountant get quotes for an annuity paying out the sums as set forth in Michael Siegel's long awaited June 18, 2003 counter-offer regarding a buy-out.

The lowest price for such an annuity was \$3,476,727 (feel free to check this out).

The net present value of the last Warner Bros. ("WB") offer is between \$1.5 - \$1.6 million (depending on how conservative one is in one's choice of the interest rate in calculating net present value).

Michael's counter-offer was therefore well over twice (230%) the last Warner Bros. offer and nearly five times the investor's original offer which I believe was based in large part on the last WB offer, rejected by the Siegel's.

It was therefore not surprising that the investor rejected your counter-offer as unrealistic. The counter-offer was so high that it may have scared away a strong potential investor (exactly what I mentioned when I asked you whether you were sure that I should communicate such a high counter-offer).

As previously explained any investor would see the obvious risks of this transaction and want to come in somewhere lower than the WB offer as a hedge or buffer against the risks of this investment (even though there is no guarantee that the Siegel's will ever settle with Warner Bros.).

To the extent you and Michael are not already aware of this, any investor will view the risks as follows:

1. Risk of costly drawn-out litigation with WB as a condition to receiving any serious participation in "profits" (subject to notorious Studio accounting practices and definitions; net profits are commonly denoted in the entertainment industry as "monkey points");
2. Risks associated with no control over the Siegel Termination Interest. Michael's interest unfortunately is a passive 25% interest in what Joanne and

9595 Wilshire Boulevard, Suite 811 Beverly Hills, CA 90212 Tel: (310) 246-3333; Fax: (310) 246-8101
Email: Mtoberoff@pwvw.blz

DB024

Aug-07-03 05:13pm From:

I=620 P=004/004 F=088

Page 2
Don Bulson, Esq.
August 6, 2003

LAW OFFICES OF
MARC TOBEROFF

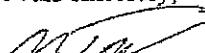
Laura Siegel negotiate and receive, and therefore there are major risks associated with this lack of control (a good reason why Michael may be interested in an investor in the first place);

3. Risk that Joanne and Laura Siegel may never arrive at a mutually acceptable settlement with Warner Bros;
4. Risk that the interest may not be monetized or bear fruit for a long time to come (a long term investment);
5. Risk that Superman will lose as opposed to gain value (there hasn't been a Superman movie since 1978 (compare the Bond franchise) and the recent failure to launch and talent package a new Superman film (lost their director and can't cast the lead) is well publicized.

I personally believe, despite the above, that this could be a smart long term investment for someone very wealthy who can afford to hold the investment for an unpredictable, and potentially very lengthy period of time. However, that doesn't mean that an investor will not weigh the reasonableness of the price against the above risks.

Please convey this letter to Michael and let me know what you and Michael suggest I do to salvage this situation.

Best regards,

Yours sincerely,


Marc Toberoff

DB025

Aug-07-03 05:13pm From:

T-625 P 001/003 F-085

**LAW OFFICES OF
MARC TOBEROFF**

9595 Wilshire Blvd., Suite 811
Beverly Hills, CA 90212
Ph: (310) 246-3333 · Fax: (310) 246-3101

FACSIMILE COVER PAGE

TO: Don Bulson, Esq.	FAX: (216) 621-6165
FROM: Marc Toberoff, Esq.	PAGES (including cover): 3
DATE : 8/6/03	RE: Michael Siegel

COMMENTS: Please find attached my letter dated August 6, 2003. The original will also be sent via US mail.

THE INFORMATION CONTAINED IN THIS TRANSMISSION IS INTENDED ONLY FOR USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IF THE READER OF THIS TRANSMISSION IS NOT THE INTENDED RECIPIENT, ANY DISSEMINATION, DISTRIBUTION OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE AND RETURN THE ORIGINAL TRANSMISSION TO US AT THE ABOVE ADDRESS VIA THE US POSTAL SERVICE. THANK YOU.

DB026

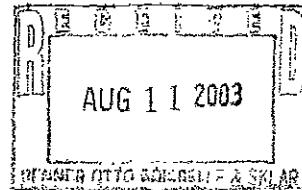
**LAW OFFICES OF
MARC TOBEROFF**

August 6, 2003

Via facsimile: (216) 621-6165 and US Mail

Don Bulson, Esq.
Renner, Otto, Boisselle & Sklar, LLP
1621 Euclid Ave., 19th Floor
Cleveland, OH 44115-2191

Re: Michael Siegel



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Page 2

Don Bulson, Esq.
August 6, 2003

LAW OFFICES OF
MARC TOBEROFF

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Best regards.

Yours sincerely,



Marc Toberoff

DB028