

# EXHIBIT 7



6. "Joyce" shall mean Plaintiff's attorney Edward T. Joyce.
7. "Spehar" and/or "GS" shall mean Gerry Spehar and Spehar Capital, LLC.
8. "Todhunter" and/or "JT" shall mean Spehar's attorney Jud Todhunter.
9. "BF" shall mean Robert Fishman, Esq. Mr. Fishman represented ETJ in connection with ETJ drafting and negotiating a fee agreement with Plaintiff.
10. "SC" shall mean Sean Crotty, Esq. Mr. Crotty is a lawyer with whom Spehar apparently consulted regarding claims that Spehar believes his company may have against Defendants.
11. "Defendants" shall mean Defendants Mayer Brown Rowe & Maw LLP and Ronald B. Given.
12. The "Unclean Hands Issue" shall mean the issue as articulated by Judge Kendall on October 30, 2007 when she stated "...there is a question lurking about why this was handled the way it was and issues as to the trustee's position in coming forward and being paid by this entity, issues regarding why the trustee didn't go in and move to vacate the dismissal, and I think what we need to do is we need to do discovery solely on that, what I would call, unclean hands issue first...," and on December 13, 2007 when she stated, "[the unclean hands issue is] really getting to the issue as to what was the motivation for the filing of the lawsuit..."
13. "WP" shall mean the work product privilege.
14. "A/C" shall mean the attorney client privilege.

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LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
1	JLM	None	Handwritten notes by JLM reflecting her mental impressions of phone conversations she had with Spehar regarding Rule 2004 subpoenas for documents that were issued on third parties in the bankruptcy proceeding as part of Plaintiff's investigation into potential claims against Defendants. These notes are privileged because they were prepared by Plaintiff's attorneys in anticipation of litigation/trial and they reveal Plaintiff's attorney's mental impressions and legal strategies regarding this case.	Undated	Handwritten notes	WP	Responsive to Request Numbers 1, 3 and 8.	980-986
2	DG	RDC	Fax regarding Grochocinski's thoughts on a draft Tolling Agreement for Louis Franco. This document is privileged because it was prepared in confidence by Plaintiff for his attorneys in anticipation of litigation/trial and it relates to Plaintiff's investigation of potential claims against Defendants.	8/23/06	Fax	A/C and WP	Responsive to Request Numbers 1 and 11	993-994
3	RDC	DG	Letter enclosing draft Letter and Tolling Agreement for Louis Franco. This document is privileged because it was prepared in confidence by Plaintiff's attorneys for Plaintiff in anticipation of litigation/trial and it relates to	8/16/06	Letter and Draft Tolling Agreement	A/C and WP	Responsive to Request Numbers 1 and 11	995-998

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LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
4	RDC	Joyce, AWA, JLM, DG, GS, and JT	Plaintiff's investigation of potential claims against Defendants. One-page letter with a memorandum. In the letter, Carroll summarizes his mental impressions and legal analysis (as of 8/1/06) regarding potential claims against Defendants. In the attached memorandum, Carroll provides a detailed legal analysis of Plaintiff's potential claims against Defendants. This document is privileged because it was prepared in confidence by Plaintiff's attorneys for Plaintiff in anticipation of litigation/trial and it reveals Plaintiff's attorney's mental impressions and legal analysis of Plaintiff's claims against Defendants. Moreover, although the document was shared with Spehar, it is protected by the attorney-client privilege pursuant to the "common-interest" doctrine.	8/01/06	Letter and Memo	A/C and WP	Responsive to Request Numbers 1 and 8.	999-1012
5	DG	RDC	In this email, Grochocinski describes his thoughts and mental impressions of Carroll's 8/01/06 memorandum (PL 1000-1012; Log # 4.) This document is privileged because it was prepared in confidence by Plaintiff for his attorneys in anticipation of litigation/trial and it	8/02/06	Email	A/C and WP	Responsive to Request Number 1.	1013

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LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
			reveals Plaintiff's mental impressions and legal theories regarding this case.					
6	RDC	DG	Letter regarding Rule 2004 subpoenas for documents. This document is privileged because it was prepared in confidence by Plaintiff's attorneys for Plaintiff in anticipation of litigation/trial and it relates to Plaintiff's investigation of potential claims against Defendants.	4/26/06	Letter	A/C	Responsive to Request Numbers 1, 3 and 11.	1014
7	RDC	DG	Letter regarding update on status of investigation and strategy for investigation. This document is privileged because it was prepared in confidence by Plaintiff's attorneys for Plaintiff in anticipation of litigation/trial and it relates to Plaintiff's investigation of potential claims against Defendants.	4/05/06	Letter	A/C	Responsive to Request Numbers 1 and 11.	1015-1016
8	JLM	DG	Fax regarding Sealaska confidentiality agreement with CMGT. (Document PL 1019-1022 is the Sealaska confidentiality agreement that was attached to the fax. The confidentiality agreement was produced.) This document is privileged because it was prepared in confidence by Plaintiff's attorneys for Plaintiff in anticipation of litigation/trial and it relates to	6/14/06	Fax	A/C	Responsive to Request Numbers 1 and 3.	1017

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LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
9	RDC	AWA	In this memorandum, Carroll provides a chronology of the facts as he understood them as of November 7, 2005 and a legal analysis of potential claims against Defendants. This document is privileged because it was prepared by Plaintiff's attorneys in anticipation of litigation/trial and it reveals Plaintiff's attorney's mental impressions and legal analysis of Plaintiff's claims against Defendants.	11/07/05	Memo	WP	Responsive to Request Number 1.	1200-1208
10	RDC	None	In this memorandum, Carroll sets forth his mental impressions and questions regarding CMGT related emails and corporate documents that he reviewed as part of Plaintiff's investigation into potential claims against Defendants. This document is privileged because it was prepared by Plaintiff's attorneys in anticipation of litigation/trial and it reveals Plaintiff's attorney's mental impressions and legal analysis of Plaintiff's claims against Defendants.	Undated	Memo/Typed notes	WP	Responsive to Request Number 1.	1209-1210
11	RDC	ETJ and AWA	In this memorandum, Carroll summarizes the results of legal research he conducted regarding the "New Business Rule." This document is	1/11/06	Memo	WP	Responsive to Request Number 1.	1211-1214

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LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
12	RDC	ETJ, AWA, JLM, DG, GS and JT	In this memorandum, Carroll summarizes potential claims against Defendants and describes a legal strategy for further investigative efforts. This document is privileged because it was prepared by Plaintiff's attorneys in anticipation of litigation/trial and it reveals Plaintiff's attorney's mental impressions, legal analysis and legal strategies regarding Plaintiff's claims against Defendants.	12/09/05 (updated as of 3/6/06)	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	1215-1223
13	RDC	AWA and JLM	In this memorandum, Carroll provides other ETJ attorneys with a status update of their collective investigative efforts. Carroll also discusses a legal theory advanced by Spehar regarding a damage related issue previously raised by ETJ and RDC's mental impressions regarding that legal theory. This document is privileged because it was prepared by Plaintiff's attorneys in anticipation of litigation/trial and it reveals Plaintiff's attorney's mental	7/10/06	Memo	WP	Responsive to Request Number 1.	1224-1225

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LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
14	RDC	ETJ, GS, DG and JT	In this memorandum, Carroll summarizes potential claims against Defendants and describes a legal strategy for further investigative efforts. This document is privileged because it was prepared by Plaintiff's attorneys in anticipation of litigation/trial and it reveals Plaintiff's attorney's mental impressions, legal analysis and legal strategies regarding Plaintiff's claims against Defendants.	12/09/05	Memo	WP	Responsive to Request Number 1.	1226-1230
15	DG	RDC	In this one page fax, Grochocinski gives his thoughts on a draft Tolling Agreement for Louis Franco. (Same as PL 993-94; Log # 2.)	8/23/06	Fax	A/C and WP	Responsive to Request Numbers 1, 3 and 4.	1233
16	JT	RDC (ETJ), GS, DG	On August 1, 2006, Carroll wrote a memo to Plaintiff regarding Carroll's analysis of potential claims against Defendants. (PL 1000-1012; Log # 4.) Plaintiff subsequently shared that memo with Spehar. In response to Carroll's memo, Todhunter wrote a letter to Carroll (PL 1243-44) in which Todhunter discusses the legal conclusions made by Carroll in his August 1, 2006 memo. This document	8/04/06	Letter	WP	Responsive to Request Numbers 1, 3 and 8.	1243-1244

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LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
			is privileged because it was prepared for Plaintiff and Plaintiff's attorneys in anticipation of litigation/trial and it reveals Plaintiff's attorney's mental impressions and legal analysis of Plaintiff's claims against Defendants.					
17	JT	RDC (ETJ)	Same as PL 1243-1244 (Log # 16), except that this copy has a fax cover page.	8/04/06	Letter	WP	Responsive to Request Numbers 1, 3 and 8.	1245-1247
18	RDC	DG	Letter regarding update on status of investigation. This document is privileged because it was prepared in confidence by Plaintiff's attorneys for Plaintiff in anticipation of litigation/trial and it relates to Plaintiff's investigation of potential claims against Defendants.	7/26/06	Letter	A/C	Responsive to Request Numbers 1.	1317-1318
19	RDC	DG	Letter regarding Rule 2004 Subpoenas for documents. (Same as PL 1014; Log # 6.)	4/26/06	Letter	A/C	Responsive to Request Numbers 1 and 3.	1355
20	RDC	DG	Same as PL 1015-1016 (Log # 7.)	4/05/06	Letter	A/C	Responsive to Request Number 1.	1356-1358
21	JLM	Joyce, AWA, RDC, GS and DG	This memo was attached to an email from JLM to GS and DG dated August 10, 2006 (PL 1950.) In this memorandum, JLM summarizes the	8/10/06	Memo	A/C and WP	Responsive to Request Numbers 1, 3, 8 and 11.	1951-1953

LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
22	GS	DG and JT	<p>current status of responses to the Rule 2004 subpoenas for documents that Plaintiff issued in the bankruptcy proceeding as part of his investigative efforts. This document is privileged because it was prepared in confidence by Plaintiff's attorneys for plaintiff in anticipation of litigation/trial and it reveals Plaintiff's attorneys legal strategies relating to this case. Moreover, although the document was shared with Spehar, it is protected by the attorney-client privilege pursuant to the "common-interest" doctrine.</p>	7/27/06	Email	WP	<p>Responsive to Request Numbers 1, 3, 8, and 11.</p>	1960-1963

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LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
23	GS	DG, JT and ETJ	<p>because it was prepared for Plaintiff in anticipation of litigation/trial and it reveals Plaintiff's (including Plaintiff's attorneys') mental impressions and legal theories regarding claims against Defendants and others.</p> <p>This memo is an attachment to Spehar's 7/27/06 email to Grochocinski (PL 1960-63; Log # 22.) The memorandum is entitled "Memo CMGT v. Mayer Brown." Prior to Spehar writing this memo, he and ETJ had discussions in which ETJ raised questions/issues relating to the duty, causation and damage elements of a legal malpractice claim against Defendants. In this memo, Spehar provides a detailed response to the questions/issues previously raised by ETJ. The memo also provides a detailed chronology of facts for Plaintiff to review as part of his investigation. This document is privileged because it was prepared for Plaintiff in anticipation of litigation/trial and it reveals ETJ's mental impressions, legal theories and legal strategies for the case.</p>	5/29/06	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	1964-2023
24	GS	DG and JT	<p>Prior to Spehar writing this email and</p>	7/27/06	Email with	WP	Responsive to	2024-

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LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
			memo, he had discussions with ETJ in which ETJ raised questions/issues relating to the damage element of a legal malpractice claim against Defendants. In this email and the attached memo, Spehar discusses cases that Plaintiff (including Plaintiff's attorneys) was reviewing in relation to the damage questions/issues raised by ETJ. This document is privileged because it was prepared for Plaintiff in anticipation of litigation/trial and it reveals Plaintiff's (including Plaintiff's attorneys') mental impressions and legal theories regarding the case.					
25	JT	GS and DG (RDC/ETJ received a copy of the 8/4/06 letter, but not the email)	This letter was attached to an email from Todhunter to GS and DG dated August 4, 2006 (PL 2030.) The letter is the same as PL 1243-1244 (Log # 16.)	8/04/06	Letter	WP	Responsive to Request Numbers 1, 3 and 8.	2031-2032
26	GS	DG JT and ETJ	This memo was attached to an email from Spehar to Todhunter and Grochocinski on August 7, 2006 (PL 2033.) The Memo is entitled "CMGT v. MB Damages Summary." Prior to Spehar writing this memo, he and ETJ had discussions in which ETJ raised	8/07/06	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	2034-2042

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LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
27	GS	DG, JT and ETJ	<p>certain damage related questions/issues. In this memo, Spehar addresses the damage related questions/issues that ETJ previously raised. This document is privileged because it was prepared for Plaintiff in anticipation of litigation/trial and it reveals ETJ's mental impressions, legal theories and legal strategies for the case.</p> <p>This memo was attached to an email from Spehar to Todhunter and Grochocinski on August 7, 2006 (PL 2043.) The memo is entitled "August 6, 2006 Memo to David Grochocinski and Jud Todhunter Spehar Capital's Response to Rob Carroll's August 1, 2006 Status Update: CMGT v. MB." On August 1, 2006, Carroll wrote a memo to Plaintiff regarding Carroll's legal analysis of potential claims against Defendants (PL 1000-1012; Log # 4.) Plaintiff subsequently shared that memo with Spehar. Spehar's 8/06/06 memo (PL 2044-67) is his response to Carroll's 8/01/06 memo. This document is privileged because it was prepared for Plaintiff and Plaintiff's attorneys in anticipation of litigation/trial and it reveals Carroll's</p>	8/07/06	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	2044-2067

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LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
			legal analysis. In fact, Spehar quotes portions of Carroll's 8/01/06 memo in his (Spehar's) 8/06/06 memo.					
28	GS	DG and JT	Prior to writing this email, Spehar had a conversation with Grochocinski regarding Carroll's 8/1/06 memo. In this email, Spehar discusses Grochocinski's thoughts/mental impressions regarding Carroll's 8/01/06 memo. Spehar also discusses his reaction to Carroll's 8/1/06 memorandum. This document is privileged because it was prepared for Plaintiff in anticipation of litigation/trial and it reveals Plaintiff's and Plaintiff's attorney's thoughts and mental impressions regarding Plaintiff's claims against Defendants.	8/02/06	Email	WP	Responsive to Request Numbers 1, 3 and 8.	2068-2071
29	DG	GS and JT	In this email, Grochocinski responds to Spehar's 8/02/06 email (PL 2068-2071 Log # 28.) This document is privileged because it was prepared by Plaintiff in anticipation of litigation/trial and it reveals Plaintiff's mental impressions concerning the case.	8/02/06	Email	WP	Responsive to Request Numbers 1, 3 and 8.	2072-2076
30	DG	RDC	In this email, Grochocinski briefly describes a conversation that he had with a CMGT investor regarding CMGT. This document is privileged	9/12/06	Email	A/C and WP	Responsive to Request Numbers 1, 3 and 4.	2187

LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
			because it was prepared in confidence by Plaintiff for his attorneys in anticipation of litigation/trial in relation to Plaintiff's claims against Defendants and it reveals Plaintiff's mental impressions and legal strategies regarding this case.					
31	GS	DG and JT	This memo is an attachment to an email from GS to DG and JT dated 8/08/06. (The email is Bate stamped PL 2188-89 and was not withheld). The memo is entitled "Issues for 4/31/06 conference call with DG, Joyce and Jud." Prior to Spehar writing this memo, he had discussions with ETJ during which ETJ discussed legal strategies and thoughts regarding potential claims against Defendants. In this memo, Spehar summarizes parts of those discussions. This document is privileged because it was prepared for Plaintiff in anticipation of litigation/trial and it reveals ETJ's legal strategy and mental impressions regarding this case.	Undated	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	2190-2192
32	GS	DG and JT	In this email, Spehar summarizes conversations he had with ETJ regarding ETJ's mental impressions/legal analysis of Plaintiff's claims against Defendants. This	8/02/06	Email	WP	Responsive to Request Numbers 1, 3 and 8.	2216-2217

PRIVILEGE LOG FOR TRUSTEE'S DOCUMENTS (CONT'D)

LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
			document is privileged because it was prepared for Plaintiff in anticipation of litigation/trial and it reveals Plaintiff's attorneys' mental impressions and legal analysis of Plaintiff's claims against Defendants.					
33	DG	RDC, GS, JT and BF	In this email, Grochocinski discusses the status of Plaintiff's investigation into potential claims against Defendants. Grochocinski discusses a legal argument/strategy that was being considered by him and his attorneys. This document is privileged because it was prepared in confidence by Plaintiff for his attorneys in anticipation of litigation/trial and it reveals Plaintiff's mental impressions and legal strategy regarding the case. Moreover, although the document was shared with Spehar, it is protected by the attorney-client privilege pursuant to the "common-interest" doctrine.	7/31/06	Email	A/C and WP	Responsive to Request Numbers 1, 3 and 8.	2219
34	RDC	Joyce, AWA, JLM, DG, GS and JT	Same letter and memo as PL 999-1012. (Log # 4.)	8/01/06	Letter with memo attached	A/C and WP	Responsive to Request Numbers 1 and 8.	2232-2246
35	JT	DG and GS	In this email, Todhunter sends Grochocinski a case that had previously been sent to Spehar by ETJ relating to a	8/03/06	Email with a case attached.	WP	Responsive to Request Numbers 1, 3	2247-2259

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LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
			damages issue. This document is privileged because it was prepared for Plaintiff in anticipation of litigation/trial and it reveals Plaintiff's attorney's mental impressions, legal strategies and legal theories regarding Plaintiff's claims against Defendants.				and 8.	
36	RDC	DG	Letter regarding update on status of investigation into potential claims against Defendants. (Same as PL 1317-18; Log # 18.)	7/26/06	Letter	A/C	Responsive to Request Numbers 1.	2260-2261
37	DG	RDC, GS, JT and BF	Same as PL 2219. (Log # 33.)	7/31/06	Email	A/C and WP	Responsive to Request Numbers 1, 3 and 8.	2263
38	DG	RDC, GS and JT	Email from Grochocinski regarding status of investigation and RDC's thoughts about the case. This document is privileged because it was prepared in confidence by Plaintiff for his attorneys in anticipation of litigation/trial and it reveals Plaintiff's attorney's mental impressions regarding Plaintiff's claims against Defendants. Moreover, although the document was shared with Spehar, it is protected by the attorney-client privilege pursuant to the "common-interest" doctrine.	7/25/06	Email	A/C and WP	Responsive to Request Numbers 1, 3 and 8.	2267

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LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
39	GS	DG and JT	In this email, Spehar discusses his understandings of what RDC's mental impressions/legal theories were regarding potential claims against Defendants. Spehar's statements, while not an entirely accurate description of RDC's thoughts and/or comments, do reveal RDC's mental impressions/legal theories regarding this case. The subject matter of Spehar's email relates primarily to the damages element of a legal malpractice claim. Prior to Spehar writing the attached memo, he and ETJ had discussions in which ETJ raised damage related questions/issues. In his memo, Spehar addresses the damage related questions/issues previously raised by ETJ. Spehar specifically discusses RDC's interpretation of certain cases. This document (the email and the attached memo) is privileged because it was prepared for Plaintiff in anticipation of litigation/trial and it reveals RDC's mental impressions and legal theories regarding Plaintiff's claims in this case.	7/24/06	Email with a memo attached	WP	Responsive to Request Numbers 1, 3 and 8.	2268-2277
40	GS	DG and JT	In this email, Spehar discusses Carroll's thoughts/legal analysis regarding potential claims against	7/25/06	Email	WP	Responsive to Request Numbers 1, 3	2278-2279

PRIVILEGE LOG FOR TRUSTEE'S DOCUMENTS (CONT'D)

LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
			Defendants. This document is privileged because it was prepared for Plaintiff in anticipation of litigation/trial and it reveals Plaintiff's attorneys mental impressions and legal analysis of Plaintiff's claims.				and 8.	
41	GS	DG and JT	In this email, Spehar discusses his understandings of what RDC's mental impressions/legal theories were regarding potential claims against Defendants. Spehar's statements, while not an entirely accurate description of RDC's thoughts and/or comments, do reveal RDC's mental impressions/legal theories regarding this case. This document is privileged because it was prepared for Plaintiff in anticipation of litigation/trial and it reveals RDC's mental impressions and legal theories regarding Plaintiff's claims in this case.	7/25/06	Email	WP	Responsive to Request Numbers 1, 3 and 8.	2280-2282
42	GS	DG and JT	In this memo, Spehar discusses various approaches/legal strategies for addressing damage related issues that had been the subject of discussions between Spehar and ETJ. (This memo is an attachment to an email that was Bates stamped PL 2283. The email was not withheld.) This document is	7/26/06	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	2284-2288

**PRIVILEGE LOG FOR TRUSTEE'S DOCUMENTS (CONT'D)**

LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
43	GS	ETJ, DG and JT	<p>privileged because it was prepared for Plaintiff in anticipation of litigation/trial and it reveals Plaintiff's attorneys mental impressions and legal theories regarding Plaintiff's claims against Defendants.</p> <p>Memorandum entitled "MB's duty to appear at SC's 2/26/04 Default Judgment Hearing." Prior to Spehar writing this memo, he and ETJ had discussions in which ETJ raised damage related questions/issues. In his memo, Spehar addresses the damage related questions/issues previously raised by ETJ. As the title of the memo indicates, the damages theory being discussed involves establishing Defendants' duty to appear at the February 26, 2004 default judgment hearing in the Spehar Lawsuit. (This memo is an attachment to an email that was Bates stamped PL 2283. The email was not withheld.) This document is privileged because it was prepared for Plaintiff in anticipation of litigation/trial and it reveals Plaintiff's attorneys mental impressions and legal theories regarding Plaintiff's claims against Defendants.</p>	7/24/06	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	2289-2299

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LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
44	GS	DG and JT (ETJ received the attached memo, but not the email.)	In this email (PL 2300-2302), Spehar discusses certain legal theories and strategies for establishing damages that were being considered by ETJ. The attached memo is entitled "MB's Duty to Appear at SC's 2/26/04 Default Judgment Hearing." Prior to Spehar writing this memo, he and ETJ had discussions in which ETJ raised certain damage related questions/issues. In this memo, Spehar discusses the damage related questions/issues that ETJ previously raised. As the title of the memo indicates, the damages theory being discussed involves establishing Defendants' duty to appear at the February 26, 2004 default judgment hearing in the Spehar Lawsuit. This document is privileged because it was prepared for Plaintiff in anticipation of litigation/trial and it reveals legal strategies being considered by ETJ.	7/30/06	Email with a memo attached	WP	Responsive to Request Numbers 1, 3 and 8.	2300-2314
45	GS	DG and JT (ETJ prepared the attached memo and received a copy of the	In the email (PL 2317-2322 and PL 2330-2335), Spehar discusses ETJ's legal theories, legal strategies and mental impressions regarding Plaintiff's claims against Defendants. The attached memo, is a copy of RDC's 12/9/05 memo (Bates numbers	7/28/06	Email with a memo and letter attached	WP	Responsive to Request Numbers 1, 3 and 8.	2317-2335

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LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
		attached letter, but ETJ did not receive the email.)	PL 1215-1223; Log # 12.) The attached letter, which is dated 3/06/06, was written by Spehar to RDC/ETJ. In the letter, Spehar discusses the merit of potential claims against Defendants and damages related questions/issues that were previously raised by ETJ. This document is privileged because it was prepared for Plaintiff in anticipation of litigation/trial and it reveals ETJ's mental impressions, legal theories and legal strategies for this case.					
46	RDC	DG and Joyce	Email regarding fee agreement. A proposed fee agreement is attached. This document is privileged because it was prepared in confidence by Plaintiff's attorneys for Plaintiff.	9/30/05	Email with attachment	A/C	Responsive to Request Number 9.	3045-3062
47	RDC	DG	Email regarding fee agreement. A proposed fee agreement is attached. This document is privileged because it was prepared in confidence by Plaintiff's attorneys for Plaintiff.	10/13/05	Email with attachment	A/C	Responsive to Request Number 9.	3070-3086
48	DG	RDC/ETJ	Same as PL 1013. (Log # 5.)	8/02/06	Email	A/C and WP	Responsive to Request Number 1.	3129
49	RDC	DG, AWA and Joyce	Email regarding scheduling time to talk. This document is privileged because it was prepared in confidence by Plaintiff's attorneys for Plaintiff.	8/02/06	Email	A/C	Responsive to Request Number 1.	3129

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50	DG	RDC/ETJ	Same as PL 1013. (Log # 5.)	8/02/06	E-mail	A/C and WP	Responsive to Request Number 1.	3131
51	RDC	DG, AWA and Joyce	Same as PL 3129. (Log # 49.)	8/02/06	Email	A/C	Responsive to Request Number 1.	3130-3131
52	DG	RDC/ETJ	Email regarding scheduling time to talk. This document is privileged because it was prepared in confidence by Plaintiff for his attorneys.	8/02/06	Email	A/C	Responsive to Request Number 1.	3130
53	RDC	DG	Email regarding scheduling time to talk. This document is privileged because it was prepared in confidence by Plaintiff's attorneys for Plaintiff.	8/03/06	Email	A/C	Responsive to Request Number 1.	3130
54	DG	RDC, GS, and JT	Same as PL 2267. (Log # 38.)	7/25/06	Email	WP	Responsive to Request Numbers 1, 3 and 8.	3134
55	DG	RDC, GS, JT and BF	Same as PL 2219. (Log # 33.)	7/31/06	Email	A/C and WP	Responsive to Request Numbers 1, 3 and 8.	3135
56	DG	RDC/ETJ	Same as PL 1013. (Log # 5.)	8/02/06	Email	A/C and WP	Responsive to Request Number 1.	3136
57	DG	RDC/ETJ	Same as PL 1013. (Log # 5.)	8/02/06	Email	A/C and WP	Responsive to Request Number 1.	3137-3138
58	RDC	DG, AWA	Same as PL 3129. (Log # 49.)	8/02/06	Email	A/C	Responsive to	3137

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		and Joyce					Request Number 1.	
59	DG	RDC/ETJ	Same as PL 3130. (Log # 52.)	8/02/06	Email	A/C	Responsive to Request Number 1.	3137
60	DG	RDC/ETJ	Email regarding status of investigation of potential claims against Defendants. In this email, Grochocinski refers to a case being considered by ETJ regarding a damages issue. This document is privileged because it was prepared in confidence by Plaintiff for his attorneys in anticipation of litigation/trial and it reveals Plaintiff's mental impressions/legal theories regarding the case.	8/03/06	Email	A/C and WP	Responsive to Request Number 1.	3139
61	DG	RDC/ETJ	Same as PL 1013. (Log # 5.)	8/02/06	Email	A/C and WP	Responsive to Request Number 1.	3141-3142
62	RDC	DG, AWA and Joyce	Same as PL 3129. (Log # 49.)	8/02/06	Email	A/C	Responsive to Request Number 1.	3141
63	DG	RDC/ETJ	Same as PL 3130. (Log # 52.)	8/02/06	Email	A/C	Responsive to Request Number 1.	3140-3141
64	RDC	DG	Same as PL 3130. (Log # 53.)	8/03/06	Email	A/C	Responsive to Request Number 1.	3140
65	DG	RDC/ETJ	Email regarding scheduling time to	8/03/06	Email	A/C	Responsive to	3140

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LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
			talk. This document is privileged because it was prepared in confidence by Plaintiff for his attorneys.				Request Number 1.	
66	GS	RDC/ETJ, SC	Memorandum entitled "Memo: CMGT v. Mayer Brown." At ETJ's request, Spehar gave ETJ a memo summarizing facts and potential claims. This memo was sent to ETJ via email. The email to which this memo was attached was produced with bates number PL 3147. This document is privileged because it was prepared for Plaintiff in anticipation of litigation/trial and it reveals legal theories considered by Plaintiff's attorneys.	Undated	Memo	WP	Responsive to Request Numbers 1, 3, 8 and 11.	3148-3172
67	GS	RDC/ETJ	At ETJ's request, Spehar provided suggestions for the Rule 2004 document subpoenas that were issued to third-parties before the Complaint was filed. In this email, Spehar provides ETJ with those suggestions. This document is privileged because it was prepared for ETJ in anticipation of litigation/trial and it reveals ETJ's legal strategies regarding Plaintiff's claims against Defendants.	5/08/06	Email	WP	Responsive to Request Numbers 1, 3 and 8.	3550-3551
68	RDC	NONE	RDC notes regarding his thoughts, legal theories and legal strategies regarding potential claims against	Undated	Handwritten notes	WP	Responsive to Request Number 1.	3620-3622

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LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
			Defendants. This document is privileged because it was prepared by Plaintiff's attorney in anticipation of litigation/trial and it reveals Plaintiff's attorney's mental impressions, legal theories and legal strategies regarding Plaintiff's claims against Defendants.					
69	RDC	NONE	RDC notes regarding his thoughts, legal theories and legal strategies regarding potential claims against Defendants. This document is privileged because it was prepared by Plaintiff's attorney in anticipation of litigation/trial and it reveals Plaintiff's attorney's mental impressions, legal theories and legal strategies regarding Plaintiff's claims against Defendants.	6/30/06	Handwritten Notes	WP	Responsive to Request Number 1.	3623
70	RDC	NONE	RDC notes from meeting with Wayne Baliga regarding CMGT and Plaintiff's potential claims against Defendants. This document is privileged because it was prepared by Plaintiff's attorney in anticipation of litigation/trial and it reveals Plaintiff's attorney's mental impressions, legal theories and legal strategies regarding Plaintiff's claims against Defendants.	Undated	Handwritten notes	WP	Responsive to Request Numbers 1, 3, 4 and 6.	3624-3625
71	RDC	NONE	RDC notes of phone conversation between Spehar, Grochocinski, and	8/10/06	Handwritten notes	WP	Responsive to Request	3626-3628

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LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
			Spehar's lawyer, Joyce, JLM and RDC regarding ETJ's thoughts, legal theories and questions about potential claims against Defendants and others. This document is privileged because it was prepared by Plaintiff's attorney in anticipation of litigation/trial and it reveals Plaintiff's attorney's mental impressions, legal theories and legal strategies regarding Plaintiff's claims against Defendants.				Numbers 1, 3, 8 and 11.	
72	RDC	NONE	RDC notes regarding contacting Louis Franco and James Wong for a meeting and tolling agreement. This document is privileged because it was prepared by Plaintiff's attorney in anticipation of litigation/trial and it reveals Plaintiff's attorney's mental impressions, legal theories and legal strategies regarding Plaintiff's claims against Defendants.	Undated	Handwritten notes	WP	Responsive to Request Numbers 1, 3, 4, 6 and 11.	3629
73	RDC	NONE	RDC notes of phone conversation with Spehar regarding facts concerning Sealaska potentially financing CMGT. This document is privileged because it was prepared by Plaintiff's attorney in anticipation of litigation/trial and it reveals Plaintiff's attorney's mental impressions, legal theories and legal strategies regarding Plaintiff's claims	Undated	Handwritten notes	WP	Responsive to Request Numbers 1, 3 and 8.	3630

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LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
74	RDC	NONE	against Defendants. RDC notes regarding case related tasks that needed to be done. This document is privileged because it was prepared by Plaintiff's attorney in anticipation of litigation/trial and it reveals Plaintiff's attorney's mental impressions, legal theories and legal strategies regarding Plaintiff's claims against Defendants.	8/14/06	Handwritten notes	WP	Responsive to Request Numbers 1.	3631
75	GS	RDC, JLM, (ETJ)	Memorandum entitled "Memo CMGT v. Mayer Brown." Prior to Spehar writing this memo, he and ETJ had discussions in which ETJ raised questions/issues relating to the duty, causation and damage elements of a legal malpractice claim against Defendants. In this memo, Spehar provides a detailed response to the questions/issues previously raised by ETJ. The memo also provides a detailed chronology of facts for Plaintiff to review as part of his investigation. This document is privileged because it was prepared for ETJ in anticipation of litigation/trial and it reveals ETJ's mental impressions, legal theories and legal strategies for the case.	5/23/06	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	3633-3688
76	GS	RDC, JLM,	Same as PL 3633-3688. (Log # 75.)	5/23/06	Memo	WP	Responsive to	3689-

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LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
		(ETJ)					Request Numbers 1, 3 and 8.	3744
77	GS	RDC, JLM, (ETJ)	Same as PL 3633-3688. (Log # 75.)	5/23/06	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	3745-3800
78	GS	RDC, JLM, (ETJ)	Same as PL 3633-3688. (Log # 75.)	5/23/06	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	3801-3856
79	GS	RDC, JLM, (ETJ)	Same as PL 3633-3688. (Log # 75.)	5/23/06	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	3857-3912
80	GS	RDC, JLM, (ETJ)	Same as PL 3633-3688. (Log # 75.)	5/23/06	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	3913-3968
81	GS	RDC/ETJ, DG, JT	Prior to Spehar writing this letter and memo, he and ETJ had discussions in which ETJ raised damage related questions/issues. In his one page July 24, 2006 letter and accompanying memo, Spehar addresses the damage related questions/issues previously raised by ETJ. The memorandum is entitled "MB's duty to appear at SC's 2/26/04 Default Judgment Hearing."	7/24/06	Letter with Memo	WP	Responsive to Request Numbers 1, 3 and 8.	3969-3980

PRIVILEGE LOG FOR TRUSTEE'S DOCUMENTS (CONT'D)

LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
82	GS	RDC/ETJ	<p>This is a one page letter that accompanied delivery of an updated version of Spehar's 7/24/06 memo. (The 7/24/06 memo is the document with Bates numbers PL 3969-3980 [Log # 81]. The updated version of the memo is Bates stamped PL 3982-3993.) In the letter, Spehar makes reference to a legal doctrine being considered by Plaintiff. This document is privileged because it was prepared for ETJ in anticipation of litigation/trial and it reveals a legal theory/strategy being considered by ETJ. The memorandum is entitled "MB's duty to appear at SC's 2/26/04 Default Judgment Hearing." Prior to Spehar writing this memo, he and ETJ had discussions in which ETJ raised certain</p>	7/31/06	Letter with Memo	WP	Responsive to Request Numbers 1, 3 and 8.	3981-3993
			<p>As the title of the memo indicates, the damages theory being discussed involves establishing Defendants' duty to appear at the February 26, 2004 default judgment hearing in the Spehar Lawsuit. This document is privileged because it was prepared for ETJ in anticipation of litigation/trial and it reveals ETJ's mental impressions, legal theories and legal strategies for the case.</p>					

PRIVILEGE LOG FOR TRUSTEE'S DOCUMENTS (CONT'D)

LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
83	AWA	GS	<p>damage related questions/issues. In this memo, Spehar discusses the damage related questions/issues that ETJ previously raised. As the title of the memo indicates, the damages theory being discussed involves establishing Defendants' duty to appear at the February 26, 2004 default judgment hearing in the Spehar California lawsuit. This document is privileged because it was prepared for ETJ in anticipation of litigation/trial and it reveals legal strategies being considered by ETJ.</p> <p>Memorandum entitled "CMGT." In this memo, Aufmann asks Spehar for more information concerning points made by Spehar in his "CMGT v. Mayer Brown" memorandum. (Bates numbers PL 3148-3172; Log # 66.) This document is privileged because it was prepared by Plaintiff's attorneys in anticipation of litigation/trial and it reveals Plaintiff's attorney's mental impressions, legal theories and legal strategies for the case.</p>	Undated	Memo	WP	Responsive to Request Numbers 1, 3, 8 and 11.	3994-4005
84	GS	ETJ	<p>In this memorandum, Spehar answers the questions that were posed by Aufmann in his "CMGT" memo (Bates</p>	Undated	Memo	WP	Responsive to Request Numbers 1, 3, 8	4006-4021

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LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
			numbers PL 3994-4005; Log # 84.) Spehar's answers are provided directly beneath Aufmann's questions. Thus, this memo reveals both Aufmann's questions and Spehar's answers to those questions. This document is privileged because it was prepared for ETJ in anticipation of litigation/trial and it reveals ETJ's mental impressions, legal theories and legal strategies for the case.				and 11.	
85	GS	ETJ	In this memorandum, Spehar answers the questions that were posed by Aufmann in his "CMGT" memo (Bates numbers PL 3994-4005; Log # 84.) Spehar's answers are provided directly beneath Aufmann's questions. Thus, this memo reveals both Aufmann's questions and Spehar's answers to those questions. This document is privileged because it was prepared for ETJ in anticipation of litigation/trial and it reveals ETJ's mental impressions, legal theories and legal strategies for the case.	Undated	Memo	WP	Responsive to Request Numbers 1, 3, 8 and 11.	4022-4041
86	GS	ETJ	Same as PL 4022-4041. (Log # 85.)	Undated	Memo	WP	Responsive to Request Numbers 1, 3, 8 and 11.	4042-4061

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LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
87	GS	ETJ	Memorandum entitled "Memo: Damages." Prior to Spehar writing this memo, he and ETJ discussed damage related issues. In this memo, Spehar addresses the damage related questions/issues that were raised by ETJ. For example, Spehar discusses legal research on damage related issues, evidence needed to establish damages and a strategy for approaching damage related issues. This document is privileged because it was prepared for ETJ in anticipation of litigation/trial and it reveals ETJ's mental impressions, legal theories and legal strategies regarding the damage element of this case.	Undated	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	4062-4074
88	GS	ETJ	Same as PL 4062-4074. (Log # 87.)	Undated	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	4075-4087
89	GS	RDC/ETJ, DG and JT	In this letter, Spehar discusses the merit of potential claims against Defendants and damages related questions/issues that were previously raised by ETJ. This document is privileged because it was prepared for ETJ in anticipation of litigation/trial and it reveals ETJ's mental impressions, legal theories and	3/06/06	Letter	WP	Responsive to Request Numbers 1, 3 and 8.	4088-4089

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LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
90	GS	ETJ	Memorandum entitled "Memo: CMGT Email and Document Review." At the request of ETJ, Spehar reviewed documents (including emails) in furtherance of a strategy being developed by ETJ for addressing damage related issues for what eventually became Count I of Plaintiff's Complaint. In this memorandum, Spehar discusses the results of his document review. This document is privileged because it was prepared for ETJ in anticipation of litigation/trial and it reveals ETJ's mental impressions, legal theories and legal strategies regarding the damage element of this case.	Undated	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	4090-4132
91	GS	ETJ	Same as PL 4090-4132. (Log # 90.)	Undated	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	4133-4175
92	GS	RDC, JLM, (ETJ)	This letter accompanied delivery of Spehar's 5/29/06 memo (Bates numbers PL 4177-4237; Log # 93.) In this letter, Spehar summarizes certain points/facts raised in his 5/29/06 memo. This document is privileged because it was prepared for ETJ in	Undated	Letter	WP	Responsive to Request Numbers 1, 3 and 8.	4176

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LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
			anticipation of litigation/trial and it reveals legal theories considered by ETJ.					
93	GS	ETJ, DG, JT and SC	This memo is a revised version of Spehar's 5/23/06 memo (Bates numbers PL 3633-3688; Log # 75.)	5/29/06	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	4177-4237
94	GS	ETJ, DG, JT and SC	Same as PL 4177-4237. (Log # 93.)	5/29/06	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	4238-4298
95	GS	ETJ, DG, JT and SC	Same as PL 4177-4237. (Log # 93.)	5/29/06	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	4299-4359
96	GS	ETJ, DG, JT and SC	Same as PL 4177-4237. (Log # 93.)	5/29/06	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	4360-4420
97	GS	ETJ, DG, JT and SC	Same as PL 4177-4237. (Log # 93.)	5/29/06	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	4421-4481
98	GS	ETJ, DG, JT and SC	Same as PL 4177-4237. (Log # 93.)	5/29/06	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	4482-4542
99	GS	ETJ	This letter accompanied delivery of Spehar's "CMGT v. MB Damages	7/03/06	Letter	WP	Responsive to Request	4623

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LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
100	GS	ETJ, DG and JT	Memorandum entitled "CMGT v. MB: Damages Summary." Prior to Spehar writing this memo, he and ETJ had discussions in which ETJ raised certain damage related questions/issues. In this memo, Spehar addresses the damages related questions/issues that ETJ previously raised. This document is privileged because it was prepared for ETJ in anticipation of litigation/trial and it reveals ETJ's mental impressions, legal theories and legal strategies for the case.	Undated	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	4624-4629
101	GS	ETJ	Same as PL 4624-4629. (Log # 100.)	Undated	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	4630-4635
102	GS	ETJ	This memo is a revised and/or earlier version of PL 4624-4629. (See, Log # 100.)	Undated	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	4636-4641

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LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
103	GS	ETJ	Memorandum entitled "Memo CMGT v. MB Damages: Lost Profits and Sealaska." Prior to Spehar writing this memo, he and ETJ had discussions in which ETJ raised certain damage related questions/issues. In this memo, Spehar addresses the damage related questions/issues that ETJ previously raised. This document is privileged because it was prepared for ETJ in anticipation of litigation/trial and it reveals ETJ's mental impressions, legal theories and legal strategies for the case.	7/08/06	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	4642-4657
104	GS	ETJ	Memorandum entitled "CMGT Damages: Collectibility." Prior to Spehar writing this memo, he and ETJ had discussions in which ETJ raised certain damage related questions/issues. In this memo, Spehar addresses the damages related questions/issues that ETJ previously raised. This document is privileged because it was prepared for ETJ in anticipation of litigation/trial and it reveals ETJ's mental impressions, legal theories and legal strategies for the case.	7/13/06	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	4658-4660
105	GS	ETJ	Memorandum entitled "CMGT	7/13/06	Memo	WP	Responsive to	4661-

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LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
106	GS	ETJ	Memorandum entitled "CMGT Damages Collectibility 2." This memo is a follow up to Spehar's 7/13/06 memo. (Bates numbers PL 4658-4660; Log # 104.) As with Spehar's 7/13/06 memo, this memo discusses damage related questions/issues that were previously raised by ETJ. In this memo, Spehar discusses cases that address the damage related questions/issues that ETJ previously raised. This document is privileged because it was prepared for ETJ in anticipation of litigation/trial and it reveals ETJ's mental impressions, legal theories and legal strategies for the case.	7/17/06	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	4663-4667
			Damages: Collectibility." Prior to Spehar writing this memo, he and ETJ had discussions in which ETJ raised certain damage related questions/issues. In this memo, Spehar addresses the damages related questions/issues that ETJ previously raised. This document is privileged because it was prepared for ETJ in anticipation of litigation/trial and it reveals ETJ's mental impressions, legal theories and legal strategies for the case.				Request Numbers 1, 3 and 8.	4662

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LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
107	GS	RDC/ETJ	This letter is a follow up to Spehar's 7/17/06 memo. (Bates numbers PL 4663-4667; Log # 106.) In this letter, Spehar discusses case law that addresses the damage related questions/issues that ETJ previously raised. Spehar specifically discusses his understanding of Carroll's interpretations of those cases. This document is privileged because it was prepared for ETJ in anticipation of litigation/trial and it reveals ETJ's mental impressions, legal theories and legal strategies for the case.	7/20/06	Letter	WP	Responsive to Request Numbers 1, 3 and 8.	4668-4671
108	GS	ETJ	Prior to Spehar writing this memo, he and ETJ had discussions in which ETJ raised certain damage related questions/issues. In this memo, Spehar discusses the damage related questions/issues that ETJ previously raised. Spehar specifically discusses two cases relating to those damage questions/issues. This document is privileged because it was prepared for ETJ in anticipation of litigation/trial and it reveals ETJ's mental impressions, legal theories and legal strategies for the case.	7/27/06	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	4672-4676
109	RDC	DG, GS and	Same as PL 999-1012. (Log # 4.)	8/01/06	Letter with	A/C and	Responsive to	4677-

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LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
		JT			Memo	WP	Request Numbers 1 and 8.	4690
110	GS	RDC/ETJ	Same as PL 2044-2067. (Log # 27.)	8/06/06	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	4692-4715
111	GS	ETJ	Memorandum entitled "CMGT v. MB: Spehar Capital's View of Causes of Action and Damages." Prior to Spehar writing this memo, he and ETJ discussed ETJ's thoughts regarding potential causes of action to be pled against Defendants. In this memo, Spehar discusses his thoughts regarding potential claims and how his views are different from and/or similar to ETJ's views. This document is privileged because it was prepared for ETJ in anticipation of litigation/trial and it reveals ETJ's mental impressions, legal theories and legal strategies for this case.	8/15/06	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	4717-4720
112	GS	ETJ	This memo was written in response to questions/issues raised by ETJ regarding the theories of damages for the potential claims against Defendants. In this memo, Spehar discusses different legal strategies and case law	Undated	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	4721-4727

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LOG #	AUTHOR	RECIPIENT	DESCRIPTION	DATE	TYPE	PRIV.	PURPOSE OF PRODUCTION	BATES #
113	GS	ETJ	Memorandum addressing questions posed by ETJ regarding how Defendants' conduct negatively affected CMGT's potential funding deal with the Washoe. This document is privileged because it was prepared for ETJ in anticipation of litigation/trial and it reveals legal theories/strategies being considered by ETJ.	Undated	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	4728-4729
114	GS	ETJ	In this memo, Spehar discusses legal strategies and case law regarding a damage related issue that had been the subject of conversations between Spehar and ETJ. This document is privileged because it was prepared for ETJ in anticipation of litigation/trial and it reveals ETJ's mental impressions, legal theories and legal strategies regarding the damages element of Plaintiff's claims.	Undated	Memo	WP	Responsive to Request Numbers 1, 3 and 8.	4730-4732

