

## AFDI v SMART -Defendants' Privilege Log

Type of communication (i.e., email, letter, memorandum, etc.)	Date of creation	Author	Addressee(s)	CC(s)	Type of Privilege (Attorney-Client, Work-Product, etc.)	Content
Email	3/17/2009	Chubb, Anthony	Gibbons, Beth		Attorney Client	Legal opinion about unrelated advertisement
Email	3/17/2009	Gibbons, Beth	Chubb, Anthony		Attorney Client	Communication requesting advice on unrelated advertisement
Email	7/24/2009	Gibbons, Beth	Chubb, Anthony; Gordon, Avery	Dryden, Elizabeth; Brown, Steve	Attorney Client	Communication requesting advice on unrelated advertisement
Email	7/24/2009	Gibbons, Beth	Chubb, Anthony; Gordon, Avery	Dryden, Elizabeth; Brown, Steve	Attorney Client	Duplicate
Email	7/28/2009	Gibbons, Beth	Chubb, Anthony		Attorney Client	Legal opinion about unrelated advertisement
Email	7/28/2009	Gibbons, Beth	Chubb, Anthony		Attorney Client	Communication requesting advice on unrelated advertisement
Email	7/28/2009	Chubb, Anthony	August, Gary		Attorney Client	Request for analysis of unrelated advertisement by outside counsel
Email	7/28/2009	Chubb, Anthony	August, Gary		Attorney Client	Request for analysis of unrelated advertisement by outside counsel
Email	7/28/2009	Chubb, Anthony	August, Gary		Attorney Client	Request for analysis of unrelated advertisement by outside counsel
Email	7/29/2009	Chubb, Anthony	Gibbons, Beth		Attorney Client	Legal opinion about unrelated advertisement
Email	7/29/2009	Chubb, Anthony	Gibbons, Beth		Attorney Client	Duplicate
Email	7/29/2009	Thwaites, Karyn	Chubb, Anthony	August, Gary	Attorney Client	Analysis by outside counsel concerning unrelated advertisement
Email	7/29/2009	Thwaites, Karyn	Chubb, Anthony	August, Gary	Attorney Client	Analysis by outside counsel concerning unrelated advertisement
Email	7/30/2009	Chubb, Anthony	Thwaites, Karyn	August, Gary	Attorney Client	Request for analysis of unrelated advertisement by outside counsel
Email	7/30/2009	Thwaites, Karyn	Chubb, Anthony	August, Gary	Attorney Client	Analysis by outside counsel concerning unrelated advertisement
Email	7/30/2009	Chubb, Anthony	Thwaites, Karyn	August, Gary	Attorney Client	Request for analysis of unrelated advertisement by outside counsel
Email	7/30/2009	Chubb, Anthony	Taylor, Darrell		Attorney Client	Communication informing department head of referral of review of unrelated advertisement to outside counsel

Email	7/30/2009	Chubb, Anthony	Thwaites, Karyn; August, Gary	Gordon, Avery	Attorney Client	Request for analysis of unrelated advertisement by outside counsel
Email	7/30/2009	August, Gary	Chubb, Anthony; Thwaites, Karyn	Gordon, Avery	Attorney Client	Analysis by outside counsel concerning unrelated advertisement
Email	7/30/2009	Chubb, Anthony	Thwaites, Karyn; August, Gary		Attorney Client	Request for analysis of unrelated advertisement by outside counsel
Email	7/30/2009	Thwaites, Karyn	Chubb, Anthony; August, Gary		Attorney Client	Analysis by outside counsel concerning unrelated advertisement
Email	7/30/2009	Thwaites, Karyn	Chubb, Anthony	August, Gary	Attorney Client	Analysis by outside counsel concerning unrelated advertisement
Email	7/30/2009	Chubb, Anthony	Thwaites, Karyn	August, Gary	Attorney Client	Request for analysis of unrelated advertisement by outside counsel
Email	7/30/2009	Thwaites, Karyn	Chubb, Anthony	August, Gary	Attorney Client	Analysis by outside counsel concerning unrelated advertisement
Email	7/30/2009	Chubb, Anthony	Thwaites, Karyn	August, Gary	Attorney Client	Analysis by outside counsel concerning unrelated advertisement
Memorandum	7/31/2009	Zausmer, Kaufman, August, Caldwell & Taylor	Gordon, Avery		Attorney Client	Memorandum offering legal opinion on unrelated advertisement from outside counsel
Email	8/10/2009	Chubb, Anthony	Gibbons, Beth		Attorney Client	Legal opinion about unrelated advertisement
Email	8/10/2009	Gibbons, Beth	Chubb, Anthony		Attorney Client	Communication following up on July 29, 2009 email and requesting advice
Email	12/28/2009	Chubb, Anthony	Gordon, Avery		Attorney Client	Analysis of legal billing
Email	1/13/2010	Gibbons, Beth	Chubb, Anthony		Attorney Client	Communication providing additional information to legal for analysis of unrelated advertisement
Email	1/20/2010	Gibbons, Beth	Chubb, Anthony		Attorney Client	Communication requesting advice on unrelated advertisement
Email	1/20/2010	Gibbons, Beth	Chubb, Anthony		Attorney Client	Duplicate
Email	1/22/2010	Chubb, Anthony	Gordon, Avery		Attorney Client	Analysis of content and policy applicable to unrelated advertisement
Email	1/22/2010	Chubb, Anthony	Gordon, Avery		Attorney Client	Legal analysis and attorney mental impressions concerning unrelated advertisement
Email	2/10/2010	Dryden, Elizabeth	Brown, Steve	Gibbons, Beth; Chubb, Anthony; Gordon, Avery	Attorney Client	Communication requesting advice and reporting legal opinions on unrelated advertisement

Email	2/10/2010	Dryden, Elizabeth	Brown, Steve	Gibbons, Beth; Chubb, Anthony; Gordon, Avery	Attorney Client	Duplicate
Email	3/3/2010	Dryden, Elizabeth	Brown, Steve	Gordon, Avery	Attorney Client	Communication requesting advice and reporting legal opinions on unrelated advertisement
Email	3/3/2010	Dryden, Elizabeth	Brown, Steve	Gordon, Avery	Attorney Client	Duplicate
Email	3/12/2010	Dryden, Elizabeth	Gordon, Avery		Attorney Client	Communication responding to request by attorney for additional information on unrelated advertisement
Email	4/6/2010	Dryden, Elizabeth	Gibbons, Beth; Chubb, Anthony	Gordon, Avery	Attorney Client	Communication requesting advice on unrelated advertisement
Email	4/6/2010	Gibbons, Beth	Dryden, Elizabeth; Chubb, Anthony	Gordon, Avery	Attorney Client	Communication requesting advice on unrelated advertisement
Email	4/7/2010	Chubb, Anthony	Dryden, Elizabeth	Gordon, Avery; Barbret, Fred; Gibbons, Beth	Attorney Client	Communication concerning legal analysis of need for advertising policy
Email	4/7/2010	Dryden, Elizabeth	Gibbons, Beth; Chubb, Anthony	Gordon, Avery	Attorney Client	Communication concerning legal analysis of need for advertising policy
Email	4/8/2010	Gordon, Avery	Dryden, Elizabeth; Gibbons, Beth; Chubb, Anthony		Attorney Client	Communication clarifying nature and extent of review being requested by legal department of unrelated advertisement
Email	4/8/2010	Gordon, Avery	Dryden, Elizabeth; Gibbons, Beth; Chubb, Anthony		Attorney Client	Duplicate
Email	4/8/2010	Gordon, Avery	Dryden, Elizabeth; Gibbons, Beth; Chubb, Anthony		Attorney Client	Duplicate
Email	4/9/2010	Dryden, Elizabeth	Gordon, Avery; Gibbons, Beth; Chubb, Anthony		Attorney Client	Previously produced - listed in error
Email	4/9/2010	Dryden, Elizabeth	Gordon, Avery; Gibbons, Beth; Chubb, Anthony		Attorney Client	Duplicate
Email	4/9/2010	Dryden, Elizabeth	Chubb, Anthony; Gordon, Avery; Gibbons, Beth		Attorney Client	Duplicate
Email	4/9/2010	Dryden, Elizabeth	Chubb, Anthony; Gordon, Avery; Gibbons, Beth		Attorney Client	Duplicate
Email	4/9/2010	Dryden, Elizabeth	Brown, Steve; Fetzer, Jim; Hollis, Richard	Gordon, Avery	Attorney Client	Communication concerning legal opinion about advertising policy and board action
Email	4/12/2010	Beth Gibbons	Anthony Chubb		Attorney Client	Communication requesting advice on Leaving Islam advertisement
Email	4/12/2010	Chubb, Anthony	Gordon, Avery		Attorney Client	Legal analysis and attorney mental impressions concerning Leaving Islam advertisement

Email	4/13/2010 Chubb, Anthony	Dryden, Elizabeth; Gordon, Avery; Gibbons, Beth		Attorney Client	Previously produced - listed in error
Email	4/13/2010 Chubb, Anthony	Dryden, Elizabeth; Gordon, Avery; Gibbons, Beth		Attorney Client	Duplicate
Email	4/13/2010 Dryden, Elizabeth	Chubb, Anthony; Gordon, Avery; Gibbons, Beth		Attorney Client	Communication requesting advice on unrelated advertisement
Email	4/13/2010 Chubb, Anthony	Dryden, Elizabeth; Gordon, Avery; Gibbons, Beth		Attorney Client	Duplicate
Email	4/13/2010 Dryden, Elizabeth	Chubb, Anthony; Gordon, Avery; Gibbons, Beth	Sisson, Mark	Attorney Client	Communication requesting advice on unrelated advertisement
Email	4/13/2010 Chubb, Anthony	Dryden, Elizabeth; Gordon, Avery; Gibbons, Beth	Sisson, Mark	Attorney Client	Legal opinion about unrelated advertisement
Email	5/21/2010 Gordon, Avery	Swatosh, John; Dryden, Elizabeth; Gibbons, Beth; Brown, Steve	Adams, Truvae	Attorney Client	Legal opinion about Leaving Islam advertisement