

**Subject:** RE: Estate of Nelva E. Brunsting [IWOV-TCLAW.00520.415]

**From:** "Reed, Cory" <CReed@thompsoncoe.com>

**Date:** 2/26/2019, 11:33 AM

**To:** Rik Munson <blowintough@att.net>, Candace Curtis <occurtis@sbcglobal.net>

**X-Account-Key:** account1

**X-UIDL:** AKo2i7B+T01WXHWUpQuYwFhPsGs

**X-Mozilla-Status:** 0011

**X-Mozilla-Status2:** 00000000

**X-Apparently-To:** blowintough@att.net; Tue, 26 Feb 2019 19:33:57 +0000

**Return-Path:** <creed@thompsoncoe.com>

**Received-SPF:** pass (domain of thompsoncoe.com designates 63.128.21.155 as permitted sender)

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**X-Originating-IP:** [63.128.21.155]

**Authentication-Results:** mta4069.sbc.mail.bf1.yahoo.com header.i=@thompsoncoe.com; header.s=s

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**Thread-Topic:** Estate of Nelva E. Brunsting [IWOV-TCLAW.00520.415]

**Thread-Index:** AdTN/AaUJVLshHm0SXm19ZggdWz1jQACQEgAAAD+RpA=

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**In-Reply-To:** <d44d0c0f-f6ed-23a7-3280-1e4cc2f92c57@att.net>

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Rik,

One of my clients biggest concerns is the attorney-client privilege which exists between them and Nelva Brunsting. Even though Nelva has passed the privilege still exists. My clients cannot waive the privilege on behalf of Nelva. Only Nelva (or in this case her personal representative) can waive the privilege. Unfortunately, the Court has not appointed a personal representative so there is not currently someone in position who can waive the privilege. To get around this concern, my clients are trying to get waivers from the five siblings as they would be the only parties "harmed" by a waiver of any privilege.

Ms. Kuntz-Freed prefers to openly discuss her legal work during her upcoming deposition, but unless the privileges are waived is severely hampered. Through the privilege waiver agreement, we are trying to stream line the process, protect my clients, and allow the parties the opportunity to ask questions regarding what would be privileged information. Likewise, my clients would like to produce its entire file related to their legal work on behalf of Nelva. Again, not all of the documents can be produced as they contain confidential and privileged information. Thus, my clients are

limited in what they can produce until everyone agrees to waive any privilege.

I am glad to hear Ms. Curtis is giving this serious consideration as it will allow the parties better access to the information they are seeking. I look forward to hearing back on any additional questions or comments Ms. Curtis may have.



Cory Reed • Partner  
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o: 713-403-8213  
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**From:** Rik Munson [mailto:blowintough@att.net]  
**Sent:** Tuesday, February 26, 2019 12:57 PM  
**To:** Reed, Cory; Candace Curtis  
**Subject:** Re: Estate of Nelva E. Brunsting [IWOV-TCLAW.00520.415]

Cory,

Ms. Curtis is at her day job and has asked me to respond.

Waiver is not likely be an issue in terms of the scheduled deposition. Ms. Curtis would like to know what documents and tangible things Anita requested in her subpoena and will review your document this evening.

Thank you

On 2/26/2019 9:52 AM, Reed, Cory wrote:

Ms. Curtis,

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Please see the attached correspondence.

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Rik Munson