

NO. 412,249-401

ESTATE OF	§	IN PROBATE COURT
	§	
NELVA E. BRUNSTING,	§	NUMBER FOUR (4) OF
	§	
DECEASED	§	HARRIS COUNTY, TEXAS

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CARL HENRY BRUNSTING, et al	§	
	§	
V.	§	
	§	
ANITA KAY BRUNSTING, et al	§	

**NOTICE OF FILING PRIVILEGE LOG**

Pursuant to the Texas Rules of Civil Procedure, Candace L. Kunz-Freed files the attached Privilege Log.

Respectfully submitted,

THOMPSON, COE, COUSINS & IRONS, L.L.P.

By: Cory S. Reed  
Zandra E. Foley  
State Bar No. 24032085  
Cory S. Reed  
State Bar No. 24076640  
One Riverway, Suite 1400  
Houston, Texas 77056  
Telephone: (713) 403-8200  
Telecopy: (713) 403-8299  
Email: [zfoley@thompsoncoe.com](mailto:zfoley@thompsoncoe.com)  
Email: [creed@thompsoncoe.com](mailto:creed@thompsoncoe.com)

**ATTORNEYS FOR CANDACE KUNZ-FREED**

**CERTIFICATE OF SERVICE**

I hereby certify that pursuant to the Texas Rules of Civil Procedure, on this the 5th day of March, 2019, a true and correct copy of this document has been forwarded by certified mail, facsimile and/or e-filing to all counsel.

Stephen A. Mendel  
Timothy J. Jadloski  
The Mendel Law Firm, L.P.  
1155 Dairy Ashford, Suite 104  
Houston, TX 77079

Neal Spielman  
Griffin & Matthews  
1155 Dairy Ashford, Suite 300  
Houston, TX 77079

Bobbie G. Bayless  
2931 Ferndale  
Houston, Texas 77098

Candace Louis Curtis  
218 Landana St.  
American Canyon, California 94503

Carole Ann Brunsting  
5822 Jason St.  
Houston, Texas 77074

Cory S. Reed  
Cory S. Reed

**DEFENDANTS' PRIVILEGE LOG**

<b>Bates No.</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>Document</b>	<b>Subject</b>	<b>Privilege</b>
V&F 002054 - V&F 002057	1/27/11	Candace L. Kuntz-Freed	Anita Kay Brunsting	Correspondence	Attorney communications to client regarding representation.	Attorney-Client Communication
V&F 002058 - V&F 002060	7/27/11	Candace L. Kuntz-Freed	Anita Kay Brunsting	Correspondence	Attorney communications to client regarding representation.	Attorney-Client Communication
V&F 002061 - V&F 002066	12/08/11	Candace L. Kuntz-Freed	Anita Kay Brunsting and Amy Ruth Brunsting	Correspondence	Attorney communications to client regarding representation.	Attorney-Client Communication
V&F 002067 - V&F 002070	12/23/10	Vacek & Freed, PLLC	Anita Kay Brunsting and Amy Ruth Brunsting	Statement	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication  Attorney Work Product
V&F 002071 - V&F 002072	3/29/11	Vacek & Freed, PLLC	Anita Kay Brunsting and Amy Ruth Brunsting	Statement	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication  Attorney Work Product

<b>Bates No.</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>Document</b>	<b>Subject</b>	<b>Privilege</b>
V&F 002073 - V&F 002075	9/20/11	Vacek & Freed, PLLC	Anita Kay Brunsting and Amy Ruth Brunsting	Statement	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication  Attorney Work Product
V&F 002076	11/29/11	Vacek & Freed, PLLC	Anita Kay Brunsting and Amy Ruth Brunsting	Statement	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication  Attorney Work Product
V&F 002077 - V&F 002078	12/28/11	Vacek & Freed, PLLC	Anita Kay Brunsting and Amy Ruth Brunsting	Statement	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication  Attorney Work Product
V&F 002079	1/12/12	Vacek & Freed, PLLC	Anita Kay Brunsting and Amy Ruth Brunsting	Statement	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication  Attorney Work Product
V&F 0020890	1/31/12	Vacek & Freed, PLLC	Anita Kay Brunsting and Amy Ruth Brunsting	Statement	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication  Attorney Work Product

<b>Bates No.</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>Document</b>	<b>Subject</b>	<b>Privilege</b>
V&F 002081	2/14/12	Vacek & Freed, PLLC	Anita Kay Brunsting and Amy Ruth Brunsting	Statement	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication  Attorney Work Product
V&F 002082 - V&F 002085	2/14/12	Vacek & Freed, PLLC	Anita Kay Brunsting and Amy Ruth Brunsting	Statement	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication  Attorney Work Product
V&F 002086 - V&F 002089	3/20/12	Vacek & Freed, PLLC	Anita Kay Brunsting and Amy Ruth Brunsting	Statement	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication  Attorney Work Product
V&F 002090 - V&F 002093	3/29/12	Vacek & Freed, PLLC	Anita Kay Brunsting and Amy Ruth Brunsting	Statement	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication  Attorney Work Product
V&F 002094	4/12/12	Vacek & Freed, PLLC	Anita Kay Brunsting and Amy Ruth Brunsting	Statement	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication  Attorney Work Product

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V&F 002095 - V&F 002096	1/24/11	Anita Brunsting	Candace L. Kunz-Freed	Email	Email string between attorney and client regarding stock valuation.	Attorney-Client Communication
V&F 002097	1/27/11	Summer Peoples	Anita Kay Brunsting	Correspondence	Attorney communications to client regarding representation.	Attorney-Client Communication
V&F 002098	7/27/11	Summer Peoples	Anita Kay Brunsting	Correspondence	Attorney communications to client regarding representation.	Attorney-Client Communication
V&F 002099	8/16/11	Candace L. Kunz-Freed	Anita Kay Brunsting	Email	Attorney communications to client regarding representation.	Attorney-Client Communication
V&F 002100	12/8/11	Summer Peoples	Anita Kay Brunsting and Amy Ruth Brunsting	Correspondence	Attorney communications to client regarding representation.	Attorney-Client Communication
V&F 002101 - V&F 002102	12/20/11	Candace L. Kuntz-Freed	Anita Kay Brunsting	Email	Email string between attorney and client regarding life insurance proceeds.	Attorney-Client Communication
V&F 002103 - V&F 002104	12/20/11	Candace L. Kuntz-Freed	Anita Kay Brunsting	Email	Email string between attorney and client regarding life insurance proceeds.	Attorney-Client Communication

<b>Bates No.</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>Document</b>	<b>Subject</b>	<b>Privilege</b>
V&F 002105 - V&F 002106	12/28/11	Summer Peoples	Anita Kay Brunsting and Amy Ruth Brunsting	Email	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication  Attorney Work Product
V&F 002107	1/03/12	Anita Kay Brunsting	Candace L. Kunz-Freed and Amy Ruth Brunsting	Email	Communication between attorney and client regarding title of the Buick.	Attorney-Client Communication
V&F 002108	1/05/12	Summer Peoples	Anita Kay Brunsting and Amy Ruth Brunsting	Correspondence	Attorney communications to client regarding Trust Information Sheets.	Attorney-Client Communication
V&F 002109 - V&F 002112	1/09/12	Candace L. Kuntz-Freed	Anita Kay Brunsting and Amy Ruth Brunsting	Email	Email string between attorney and client regarding distribution of trust funds.	Attorney-Client Communication
V&F 002113 - V&F 002114	1/22/12	Candace L. Kunz-Freed	Anita Kay Brunsting	Email	Email string between attorney and client regarding notice to beneficiaries.	Attorney-Client Communication
V&F 002115 - V&F 002116	1/23/12	Candace L. Kunz-Freed	Anita Kay Brunsting	Email	Email string between attorney and client regarding notice to beneficiaries.	Attorney-Client Communication

<b>Bates No.</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>Document</b>	<b>Subject</b>	<b>Privilege</b>
V&F 002117 - V&F 002118	1/23/12	Anita Kay Brunsting	Candace L. Kunz-Freed and Amy Ruth Brunsting	Email	Email string between attorney and client regarding trust accounting.	Attorney-Client Communication
V&F 002119 - V&F 002121	1/24/12	Anita Kay Brunsting	Candace L. Kunz-Freed and Amy Ruth Brunsting	Email	Email string between attorney and client regarding trust documents.	Attorney-Client Communication
V&F 002122 - V&F 002123	1/24/12	Anita Kay Brunsting	Candace L. Kunz-Freed and Amy Ruth Brunsting	Email	Email string between attorney and client regarding trust accounting.	Attorney-Client Communication
V&F 002124 - V&F 002125	1/31/12	Anita Kay Brunsting	Candace L. Kunz-Freed and Amy Ruth Brunsting	Email	Email string between attorney and client regarding Farmland LLC.	Attorney-Client Communication
V&F 002126 - V&F 002127	1/31/12	Summer Peoples	Anita Kay Brunsting and Amy Ruth Brunsting	Email	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication  Attorney Work Product
V&F 002128	2/14/12	Summer Peoples	Anita Kay Brunsting and Amy Ruth Brunsting	Email	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication  Attorney Work Product



<b>Bates No.</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>Document</b>	<b>Subject</b>	<b>Privilege</b>
V&F 002129	2/15/12	Summer Peoples	Anita Kay Brunsting and Amy Ruth Brunsting	Correspondence	Attorney communications to client regarding estate planning documents.	Attorney-Client Communication
V&F 002130 - V&F 002132	2/28/12	Candace L. Kunz-Freed	Anita Kay Brunsting, Amy Ruth Brunsting, and Summer Peoples	Email	Attorney communications to client regarding promissory note.	Attorney-Client Communication  Attorney Work Product
V&F 002133 - V&F 002139	3/02/12	Candace L. Kunz-Freed	Anita Kay Brunsting, Amy Ruth Brunsting, and Bernard Mathews	Email	Attorney communications to client regarding trust value report.	Attorney-Client Communication  Attorney Work Product
V&F 002140 - V&F 002142	3/06/12	Amy Ruth Brunsting	Candace L. Kunz-Freed	Email	Communication between attorney and client regarding promissory note.	Attorney-Client Communication  Attorney Work Product
V&F 002143 - V&F 002148	3/14/12	Anita Kay Brunsting	Candace L. Kunz-Freed and Amy Ruth Brunsting	Email	Communication between attorney and client regarding promissory note.	Attorney-Client Communication  Attorney Work Product

<b>Bates No.</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>Document</b>	<b>Subject</b>	<b>Privilege</b>
V&F 002149	3/20/12	Summer Peoples	Amy Ruth Brunsting, Anita Kay Brunsting, and Chip Mathews	Email	Attorney communications to client regarding request for wills.	Attorney-Client Communication
V&F 002150 - V&F 002151	3/20/13	Summer Peoples	Anita Kay Brunsting and Amy Ruth Brunsting	Email	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication  Attorney Work Product
V&F 002152	3/22/12	Anita Kay Brunsting	Candace L. Kunz-Freed, Chip Mathews, and Amy Ruth Brunsting	Email	Attorney communications to client regarding December of 2011 accounting.	Attorney-Client Communication
V&F 002153	3/22/12	Anita Kay Brunsting	Candace L. Kunz-Freed	Email	Attorney communications to client regarding accounting.	Attorney-Client Communication
V&F 002154 - V&F 002155	3/27/12	Anita Kay Brunsting	Chip Mathews, Amy Brunsting, Candace L. Kunz-Freed	Email	Email string between attorney and client regarding accounting.	Attorney-Client Communication
V&F 002156 - V&F 002158	3/28/12	Candace L. Kunz-Freed	Anita Kay Brunsting, Amy Brunsting, and Chip Mathews	Email	Email string between attorney and client regarding asset lists.	Attorney-Client Communication

<b>Bates No.</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>Document</b>	<b>Subject</b>	<b>Privilege</b>
V&F 002159	3/28/12	Candace L. Kunz-Freed	Anita Kay Brunsting, Amy Brunsting, and Bernard Mathews	Email	Attorney communications to client regarding asset lists.	Attorney-Client Communication
V&F 002160 - V&F 002161	3/29/12	Anita Kay Brunsting	Candace L. Kunz-Freed	Email	Email string between attorney and client regarding assets and expenses.	Attorney-Client Communication  Attorney Work Product
V&F 002162 - V&F 002163	3/29/12	Summer Peoples	Anita Kay Brunsting and Amy Ruth Brunsting	Email	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication  Attorney Work Product
V&F 002164 - V&F 002166	3/30/12	Candace L. Kunz-Freed	Anita Kay Brunsting, Amy Ruth Brunsting, and Bernard Mathews	Email	Email string between attorney and client regarding asset list.	Attorney-Client Communication
V&F 002167	4/12/12	Summer Peoples	Anita Kay Brunsting and Amy Ruth Brunsting	Email	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication  Attorney Work Product

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V&F 002168 - V&F 002183		Candace L. Kunz-Freed		Chart	Attorney notes/history of representation	Attorney-Client Communication  Attorney Work Product
V&F 002184 - V&F 002191	11/22/11			Document	Authorization for Release of Protected Health Information	Attorney Work Product
V&F 002192	11/22/11			Document	Authorization for Release of Information	Attorney Work Product