

**Subject:** Fwd: Freed's Privilege Log Docs

**From:** Candace Curtis <occurtis@sbcglobal.net>

**Date:** 3/29/2019, 5:59 AM

**To:** Rik Munson <blowintough@att.net>

**X-Account-Key:** account1

**X-UIDL:** AI8q75tvmM4fXJ4WwQ4RkBVrc4w

**X-Mozilla-Status:** 0001

**X-Mozilla-Status2:** 00000000

**X-Apparently-To:** blowintough@att.net; Fri, 29 Mar 2019 12:59:45 +0000

**Return-Path:** <occurtis@sbcglobal.net>

**Received-SPF:** none (domain of sbcglobal.net does not designate permitted sender hosts)

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**X-Originating-IP:** [74.6.133.126]

**Authentication-Results:** mta4068.sbc.mail.bf1.yahoo.com header.i=@sbcglobal.net; header.s=s2048

**Received:** from 144.160.152.211 (EHLO flpd572.prodigy.net) (144.160.152.211) by mta4068.sbc.ma  
12:59:45 +0000

**X-Originating-IP:** [74.6.133.126]

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**Received:** from sonic.gate.mail.ne1.yahoo.com by sonic313.consmr.mail.bf2.yahoo.com with HTTP;

**Received:** from 107-215-7-54.lightspeed.sntcca.sbcglobal.net (EHLO [192.168.1.98]) ([107.215.7.54  
Server) with ESMTPA ID c48b07559db6aec81d02301913579fc1 for <blowintough@att.net>; Fri, 29

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**Content-Transfer-Encoding:** 7bit

**MIME-Version:** 1.0 (1.0)

**Message-ID:** <D92727A4-CC7D-4760-AF5A-E15F0D0F4F68@sbcglobal.net>

**References:** <1858812850.13319284.1553817206600@mail.yahoo.com>

**X-Mailer:** iPad Mail (16D57)

**Content-Length:** 58564

Sent from my iPad

Begin forwarded message:

**From:** Carole Brunsting <[cbrunsting@sbcglobal.net](mailto:cbrunsting@sbcglobal.net)>

**Date:** March 28, 2019 at 4:53:26 PM PDT

**To:** "[nspielman@grifmatlaw.com](mailto:nspielman@grifmatlaw.com)" <[nspielman@grifmatlaw.com](mailto:nspielman@grifmatlaw.com)>, Bobbie  
Bayless <[bayless@baylessstokes.com](mailto:bayless@baylessstokes.com)>, "Reed, Cory"  
<[CReed@thompsoncoe.com](mailto:CReed@thompsoncoe.com)>

**Cc:** Tim Jadloski <[tim@mendellawfirm.com](mailto:tim@mendellawfirm.com)>, Steve Mendel

<[steve@mendellawfirm.com](mailto:steve@mendellawfirm.com)>, Candace Curtis <[occurtis@sbcglobal.net](mailto:occurtis@sbcglobal.net)>

**Subject: RE: Freed's Privilege Log Docs**

**Reply-To: "[cbrunsting@sbcglobal.net](mailto:cbrunsting@sbcglobal.net)" <[cbrunsting@sbcglobal.net](mailto:cbrunsting@sbcglobal.net)>**

Steve/Neil

When is the deposition going to continue?

Thanks

Carole

[Sent from Yahoo Mail on Android](#)

On Tue, Mar 19, 2019 at 2:49 PM, Neal Spielman  
<[nspielman@grifmatlaw.com](mailto:nspielman@grifmatlaw.com)> wrote:

Bobbie –

Attached is my copy of the materials that I received from Cory (although I renamed the file for my own internal purposes prior to my discussion with Amy about the privilege).

I don't know if you will accept these materials in lieu of them coming from Cory, but given that Amy and Anita have waived any attorney-client privilege that might apply, I wanted to send my copy out so that at least everyone has it, even if Cory does not send the materials out directly.

Neal E. Spielman  
Griffin & Matthews  
1155 Dairy Ashford, Suite 300  
Houston, Texas 77079  
281-870-1124 - telephone  
281-870-1647 - telefax  
[nspielman@grifmatlaw.com](mailto:nspielman@grifmatlaw.com)

Please take a moment to visit our website at [www.grifmatlaw.com](http://www.grifmatlaw.com)

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**From:** Bobbie Bayless [<mailto:bayless@baylessstokes.com>]  
**Sent:** Tuesday, March 19, 2019 2:30 PM  
**To:** Reed, Cory <[CReed@thompsoncoe.com](mailto:CReed@thompsoncoe.com)>  
**Cc:** Neal Spielman <[nspielman@grifmatlaw.com](mailto:nspielman@grifmatlaw.com)>; Tim Jadloski <[tim@mendellawfirm.com](mailto:tim@mendellawfirm.com)>  
**Subject:** RE: Freed's Privilege Log Docs

Cory—where are you on sending these documents?

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**From:** Bobbie Bayless  
**Sent:** Tuesday, March 19, 2019 9:46 AM  
**To:** Reed, Cory  
**Cc:** [nspielman@grifmatlaw.com](mailto:nspielman@grifmatlaw.com); Tim Jadloski  
**Subject:** RE: Freed's Privilege Log Docs

That would be great. Thanks.

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**From:** Reed, Cory [<mailto:CReed@thompsoncoe.com>]  
**Sent:** Tuesday, March 19, 2019 9:32 AM  
**To:** Bobbie Bayless  
**Cc:** [nspielman@grifmatlaw.com](mailto:nspielman@grifmatlaw.com); Tim Jadloski  
**Subject:** RE: Freed's Privilege Log Docs

This is the first I am hearing Anita has waived the privilege. I will circulate the documents to all of the parties.



Cory Reed • Partner  
One Riverway, Suite 1400, Houston, TX 77056  
o: 713-403-8213

[bio](#) • [vCard](#) • [web](#)

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**From:** Bobbie Bayless [<mailto:bayless@baylessstokes.com>]  
**Sent:** Tuesday, March 19, 2019 9:27 AM  
**To:** Reed, Cory  
**Cc:** [nspielman@grifmatlaw.com](mailto:nspielman@grifmatlaw.com); Tim Jadloski  
**Subject:** FW: Freed's Privilege Log Docs

Cory—Can you please email me the documents designated on your privilege log asap?  
Thanks.

***Bobbie G. Bayless***  
***Bayless & Stokes***  
***2931 Ferndale***  
***Houston, TX 77098***  
***713.522.2224***  
***713.522.2218 (fax)***  
[bayless@baylessstokes.com](mailto:bayless@baylessstokes.com)

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**From:** Steve Mendel [<mailto:steve@mendellawfirm.com>]  
**Sent:** Tuesday, March 19, 2019 9:20 AM  
**To:** Neal Spielman; Bobbie Bayless; Tim Jadloski  
**Subject:** RE: Freed's Privilege Log Docs

Bobbie:

For Anita, a hearing is not necessary. We waived the privilege.

Thx  
Steve

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**From:** Neal Spielman [<mailto:nspielman@grifmatlaw.com>]  
**Sent:** Tuesday, March 19, 2019 9:15 AM  
**To:** Bobbie Bayless; Tim Jadloski  
**Cc:** Steve Mendel  
**Subject:** RE: Freed's Privilege Log Docs

Bobbie –

From my/Amy's perspective we will not need a hearing. Cory sent us documents which were labeled V-F 002054 – 002192. I advised Cory by e-mail late last week that Amy had no objection to these materials being produced and waived any attorney-client privilege that might be applicable to the documents or the matters addressed in them. I have not heard anything from him since. I actually followed up with him via a second e-mail yesterday (actually prior to receiving your e-mail, below).

Just FYI, a significant percentage of the items pertain to fee agreements, retainer checks, billing invoices, HIPPA authorizations and other document release authorizations (which I wouldn't expect to move the needle from your perspective one way or the other).

Neal E. Spielman  
Griffin & Matthews  
1155 Dairy Ashford, Suite 300  
Houston, Texas 77079  
281-870-1124 - telephone  
281-870-1647 - telefax  
[nspielman@grifmatlaw.com](mailto:nspielman@grifmatlaw.com)

Please take a moment to visit our website at [www.grifmatlaw.com](http://www.grifmatlaw.com)

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**From:** Bobbie Bayless [<mailto:bayless@baylessstokes.com>]

**Sent:** Monday, March 18, 2019 3:58 PM

**To:** Tim Jadloski <[tim@mendellawfirm.com](mailto:tim@mendellawfirm.com)>

**Cc:** Neal Spielman <[nspielman@grifmatlaw.com](mailto:nspielman@grifmatlaw.com)>; Steve Mendel <[steve@mendellawfirm.com](mailto:steve@mendellawfirm.com)>

**Subject:** Freed's Privilege Log Docs

So, where does this stand? Do we need to let Comstock know that we need a hearing before the deposition begins or will these withheld items be produced?

***Bobbie G. Bayless***

***BAYLESS & STOKES***

***2931 Ferndale***

***Houston, TX 77098***

***713.522.2224***

***713.522.2218 (fax)***

***[bayless@baylessstokes.com](mailto:bayless@baylessstokes.com)***

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**THOMPSON  
COE**

— Attachments: —

image001.png

0 bytes