

EXHIBIT H

UNREDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
2	David Daleiden	David Bjornstrom		Annamarie Bettisworth	3/21/13 8:13 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding nonprofit corporations.	
7	David Bjornstrom	David Daleiden			3/21/13 6:30 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding nonprofit corporations.	
8	David Daleiden	David Bjornstrom			3/25/13 9:11 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding nonprofit corporations.	
9	David Bjornstrom	David Daleiden			3/28/13 12:17 AM	Attorney-Client	Confidential email providing legal advice of counsel regarding nonprofit corporations.	
11	David Daleiden	David Bjornstrom			3/28/13 2:04 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding nonprofit corporations.	
13	David Bjornstrom	David Daleiden			3/28/13 4:08 AM	Attorney-Client	Confidential email reflecting legal advice of counsel regarding nonprofit corporations.	Some Redactions
14	David Daleiden	David Bjornstrom			3/30/13 12:56 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding nonprofit corporations.	
16	David Daleiden	David Bjornstrom		Annamarie Bettisworth	4/4/13 9:50 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding nonprofit corporations.	
18	David Bjornstrom	David Daleiden			4/4/13 3:58 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding nonprofit corporations.	
19	David Daleiden	David Bjornstrom		Annamarie Bettisworth	4/5/13 8:36 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding nonprofit corporations.	
22	David Daleiden	Albin Rhomberg, Troy Newman	David Bjornstrom		4/11/13 2:56 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
25	Troy Newman	David Daleiden	Albin Rhomberg, David Bjornstrom		4/11/13 2:54 PM	Attorney-Client	Confidential email regarding providing legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
26	David Daleiden	Matt Bowman	Troy Newman		5/1/13 9:17 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and contract law.	
27	Casey Mattox	David Daleiden	Michael J. Norton, Catherine Glenn Foster, Matt Bowman, Troy Newman, Natalie Decker		5/1/13 6:50 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and contract law.	
28	David Daleiden	Casey Mattox	Michael J. Norton, Catherine Glenn Foster, Matt Bowman, Troy Newman, Natalie Decker		5/1/13 7:18 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods and contract law.	
29	David Daleiden	Casey Mattox	Michael J. Norton, Catherine Glenn Foster, Matt Bowman, Troy Newman, Natalie Decker		5/1/13 8:30 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods and contract law.	
30	Troy Newman	David Daleiden			5/1/13 8:33 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and contract law.	
31	Casey Mattox	David Daleiden			5/2/13 3:14 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and contract law.	
32	David Daleiden	Casey Mattox			5/2/13 8:51 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods and contract law.	

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
33	Casey Mattox	David Daleiden			5/2/13 9:29 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and contract law.	Some Redactions
34	David Daleiden	Casey Mattox	Troy Newman		5/3/13 7:26 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods, contract law, and fetal tissue procurement practices.	
35					5/3/13 7:26 PM	Attorney-Client	PDF document relating to above-email.	
36	Michael J. Norton	David Daleiden	Casey Mattox, Troy Newman		5/4/13 4:10 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods, contract law, and fetal tissue procurement practices.	
37	Casey Mattox	David Daleiden	Michael J. Norton		5/8/13 7:30 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding overall project goals.	
38	David Daleiden	Casey Mattox	Michael J. Norton, Troy Newman		5/9/13 4:14 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding overall project goals.	
39	Casey Mattox	David Daleiden	Michael J. Norton, Troy Newman		5/9/13 2:56 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding overall project goals.	
40	Troy Newman	Casey Mattox	David Daleiden, Michael J. Norton		5/9/13 3:02 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding overall project goals.	
41	Michael J. Norton	Troy Newman, Casey Mattox	David Daleiden		5/9/13 4:22 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding overall project goals.	
42	Casey Mattox	Michael J. Norton	Troy Newman, Casey Mattox, David Daleiden		5/9/13 4:25 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding overall project goals.	
43	Michael J. Norton	Casey Mattox, David Daleiden	Troy Newman, Marilyn Kuipers, Michael J. Norton		5/9/13 7:00 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding overall project goals.	
44	David Daleiden	Michael J. Norton			5/9/13 10:32 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding overall project goals.	
45	David Daleiden	Michael J. Norton	Casey Mattox, Troy Newman, Marilyn Kuipers		5/9/13 10:33 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding overall project goals.	
46	David Daleiden	Casey Mattox	Annamarie Bettisworth		5/10/13 5:18 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods.	
48	Annamarie Bettisworth	David Daleiden	Casey Mattox		5/10/13 5:22 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods.	
49	Casey Mattox	Annamarie Bettisworth, David Daleiden			5/10/13 10:21 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods.	
50	Casey Mattox	Casey Mattox, Annamarie Bettisworth, David Daleiden			5/10/13 1:26 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods.	Some Redactions
51	David Daleiden	Casey Mattox			5/10/13 3:12 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods.	
52	Casey Mattox	David Daleiden			5/10/13 3:48 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods.	
53	David Daleiden	Casey Mattox	Annamarie Bettisworth		5/10/13 3:53 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods.	
54	David Daleiden	Casey Mattox	Annamarie Bettisworth		5/10/13 3:55 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods.	
55	Casey Mattox	David Daleiden	Annamarie Bettisworth, Michael J. Norton		5/13/13 11:36 AM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods.	

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December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
56	Michael J. Norton	Casey Mattox, David Daleiden	Casey Mattox, Michael J. Norton		5/13/13 2:10 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods.	
59	David Daleiden	Casey Mattox	Michael J. Norton, Troy Newman		5/14/13 8:21 PM	Attorney-Client	Confidential email requesting and regarding seeking legal advice of counsel regarding overall project goals.	
60	Casey Mattox	David Daleiden	Michael J. Norton, Troy Newman		5/14/13 8:35 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding overall project goals and legality of fetal tissue procurement practices.	
61	David Daleiden	Casey Mattox	Michael J. Norton, Troy Newman		5/14/13 11:26 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices.	
62	Casey Mattox	David Daleiden	Troy Newman		5/15/13 12:20 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
63	Michael J. Norton	David Daleiden	Casey Mattox, Michael J. Norton, Troy Newman		5/15/13 1:12 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices and overall project goals.	
64	REDACTED	David Daleiden			5/21/13 4:32 AM	Psychotherapist-Patient Privilege	Confidential correspondence to psychotherapist regarding investigation.	
65	Casey Mattox	David Daleiden			5/23/13 12:52 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practice.	
66	David Daleiden	Casey Mattox			5/23/13 3:04 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practice.	
67	David Daleiden	Casey Mattox			5/23/13 3:04 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practice.	
68	Casey Mattox	David Daleiden	Michael J. Norton		5/23/13 2:24 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
69	Casey Mattox	David Daleiden			5/24/13 3:21 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practice.	
73	Casey Mattox	David Daleiden			5/29/13 4:47 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
75	David Daleiden	Casey Mattox			5/31/13 6:50 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices.	
76	Casey Mattox	David Daleiden			5/31/13 7:00 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding legality of fetal tissue procurement practices.	
80	David Daleiden	Casey Mattox			6/10/13 8:47 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods.	
81	David Daleiden	Casey Mattox			6/10/13 8:48 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices	
83	Casey Mattox	David Daleiden	Casey Mattox		6/10/13 11:37 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods.	
84	David Daleiden	Casey Mattox			6/10/13 11:40 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods.	
85	Casey Mattox	Casey Mattox, David Daleiden			6/11/13 3:07 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods.	
86	David Daleiden	Casey Mattox			6/11/13 7:18 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods.	
87	Casey Mattox	David Daleiden			6/11/13 5:26 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods.	
88	Casey Mattox	David Daleiden			6/12/13 11:12 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	

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December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
89	Casey Mattox	David Daleiden	Michael J. Norton		6/14/13 2:24 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding legality of fetal tissue procurement practices.	
91	David Daleiden	Claude Allen	Ray Ruddy		6/14/13 9:00 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding arrangements and planning	
93	Claude Allen	David Daleiden	Ray Ruddy		6/14/13 10:10 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding arrangements	Some Redactions
94	David Daleiden	Claude Allen			6/14/13 10:13 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	Some Redactions
95	Claude Allen	David Daleiden			6/14/13 10:26 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	Some Redactions
97	Ray Ruddy	David Daleiden	Claude Allen		6/15/13 10:39 AM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding arrangements	
98	David Daleiden	Ray Ruddy	Claude Allen		6/15/13 11:21 AM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding arrangements	Some Redactions
99	Claude Allen	David Daleiden, Ray Ruddy			6/15/13 12:40 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding arrangements	Some Redactions
100	Claude Allen	David Daleiden, Ray Ruddy			6/15/13 1:37 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding arrangements	Some Redactions
104	David Daleiden	Claude Allen	Ray Ruddy		6/15/13 8:10 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices	
107					6/15/13 8:10 PM	Attorney-Client	Word document relating to above-email.	
108					6/15/13 8:10 PM	Attorney-Client	Word document relating to above-email.	
109					6/15/13 8:10 PM	Attorney-Client	PDF document relating to above-email.	
110	Ray Ruddy	David Daleiden	Claude Allen		6/17/13 2:09 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods.	
111	David Daleiden	Ray Ruddy	Claude Allen		6/17/13 9:30 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods.	
112	David Daleiden	Ray Ruddy, Claude Allen		Annamarie Bettisworth	6/20/13 1:05 AM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email containing client information for counsel to provide legal advice regarding nondisclosure agreement.	
114	Ray Ruddy	David Daleiden, Claude Allen			6/20/13 3:58 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal advice of counsel regarding retaining outside counsel and establishing attorney-client relationship.	
115	David Daleiden	Albin Rhomberg, Troy Newman, Casey Mattox		Annamarie Bettisworth	6/20/13 8:26 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding retaining outside counsel and establishing attorney-client relationship.	
116	David Daleiden	Casey Mattox			6/21/13 1:28 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices	

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December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
117	Casey Mattox	David Daleiden			6/21/13 7:25 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices	
119	David Daleiden	Ray Ruddy	Claude Allen		6/25/13 11:26 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email containing client information for counsel to provide legal advice regarding legality of nonprofit collaboration.	
121	Albin Rhomberg	David Daleiden			6/26/13 7:32 AM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
122	Claude Allen	David Daleiden, Ray Ruddy			7/1/13 4:06 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email containing client information for counsel to provide legal advice regarding legality of nonprofit collaboration.	Some Redactions
123	David Daleiden	Claude Allen	Ray Ruddy	Annamarie Bettisworth, Albin Rhomberg	7/2/13 6:46 AM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email containing client information for counsel to provide legal advice regarding nonprofit law and nonprofit collaboration.	
124					7/2/13 6:46 AM	Attorney-Client	PDF document relating to above-email.	
125	Casey Mattox	David Daleiden			7/15/13 12:49 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding legality of fetal tissue procurement practices.	
126	David Daleiden	Casey Mattox			7/15/13 12:52 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
127	Casey Mattox	David Daleiden			7/15/13 12:53 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	Some Redactions
128	David Daleiden	Claude Allen	Ray Ruddy		7/16/13 8:16 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email containing client information for counsel to provide legal advice regarding nonprofit law and collaboration.	
131	Claude Allen	David Daleiden	Ray Ruddy		7/17/13 7:20 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email containing client information for counsel to provide legal advice regarding nonprofit law and collaboration.	Some Redactions
133	Claude Allen	David Daleiden	Ray Ruddy		7/17/13 8:35 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email regarding seeking legal advice of counsel regarding nonprofit law.	Some Redactions
134	David Daleiden	Claude Allen	Ray Ruddy		7/17/13 8:36 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email regarding seeking legal advice of counsel regarding nonprofit corporations.	Some Redactions
146	David Daleiden	Phill Kline	Claude Allen, Ray Ruddy	Albin Rhomberg	7/19/13 8:00 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and nonprofit corporations.	
147					7/19/13 8:00 PM	Attorney-Client	PDF document relating to above-email.	
149	David Daleiden	Katie Short	Jim Holman, Albin Rhomberg, Dana Cody		7/22/13 6:31 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods.	
150	Katie Short	David Daleiden	Jim Holman, Albin Rhomberg, Dana Cody		7/22/13 7:14 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal advice of counsel regarding investigative journalism methods.	
151	David Daleiden	Katie Short			7/22/13 11:31 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods.	
152	Dana Cody	David Daleiden			7/23/13 1:55 AM	Attorney-Client	Confidential email regarding providing legal advice of counsel regarding investigative journalism methods.	Some Redactions

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
153	Phill Kline	David Daleiden, Phill Kline	Claude Allen, Ray Ruddy, Hannah Tomlinson		7/24/13 2:59 AM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal advice of counsel regarding investigative journalism methods and nonprofit corporations.	
154	David Daleiden	Phill Kline	Phill Kline, Claude Allen, Ray Ruddy, Hannah Tomlinson		7/25/13 8:30 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods.	
155	Dana Cody	David Daleiden	Mary Riley		8/7/13 11:40 PM	Attorney-Client	Confidential email attachment to email providing legal advice of counsel regarding formation of attorney-client relationship.	
156					8/7/13 11:40 PM	Attorney-Client	PDF document relating to above-email.	
157					8/7/13 11:40 PM	Attorney-Client	Word document relating to above-email.	
158	David Daleiden	Albin Rhomberg, Troy Newman			8/7/13 11:51 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding retaining outside counsel to represent client.	
159					8/7/13 11:51 PM	Attorney-Client	PDF document relating to above-email.	
160					8/7/13 11:51 PM	Attorney-Client	Word document relating to above-email.	
161	Troy Newman	David Daleiden			8/8/13 12:07 AM	Attorney-Client	Confidential email providing legal advice of counsel regarding retaining outside counsel to represent client.	
162	David Daleiden	Dana Cody	Mary Riley		8/8/13 10:14 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding hiring outside counsel to represent client.	
163	Dana Cody	David Daleiden	Mary Riley		8/8/13 2:21 PM	Attorney-Client	Confidential email reflecting legal advice of counsel regarding hiring outside counsel to represent client and nonprofit collaboration.	
164	Troy Newman	David Daleiden			8/8/13 4:36 PM	Attorney-Client	Confidential email requesting information from client for counsel to provide legal advice regarding hiring outside counsel to represent client and nonprofit collaboration.	
165	David Daleiden	Troy Newman			8/8/13 5:02 PM	Attorney-Client	Confidential email providing information from client for counsel to provide legal advice regarding hiring outside counsel to represent client and nonprofit collaboration.	
166	David Daleiden	Dana Cody	Mary Riley	Albin Rhomberg	8/8/13 6:52 PM	Attorney-Client	Confidential email providing client information for client to obtain legal representation and legal advice regarding investigative journalism methods, criminal and civil defense, litigation strategies, and fetal tissue procurement methods.	
167					8/8/13 6:52 PM	Attorney-Client	Word document relating to above-email.	
168	Dana Cody	David Daleiden	Mary Riley		8/8/13 7:04 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding attorney-client representation.	
169					8/8/13 7:04 PM	Attorney-Client	Word document relating to above-email.	
170	David Daleiden	Dana Cody	Mary Riley		8/8/13 8:38 PM	Attorney-Client	Confidential email containing legal advice of counsel regarding attorney-client representation.	
171					8/8/13 8:38 PM	Attorney-Client	PDF document relating to above-email.	
172	Mary Riley	David Daleiden, Dana Cody			8/9/13 12:52 AM	Attorney-Client	Confidential email regarding seeking attorney-client legal representation.	
173					8/9/13 12:52 AM	Attorney-Client	PDF document relating to above-email.	
174	David Daleiden	Casey Mattox			8/15/13 5:03 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods and contract law.	
176	David Daleiden	Mary Riley	Dana Cody		8/15/13 5:08 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding nonprofit law.	Some Redactions

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
177	Mary Riley	David Daleiden	Dana Cody		8/15/13 3:10 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding hiring outside counsel.	Some Redactions
178	Dana Cody	Mary Riley, David Daleiden			8/15/13 8:03 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding retaining outside counsel and establishing attorney-client relationship.	Some Redactions
182	Mail Delivery Subsystem	David Daleiden			8/23/13 7:56 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
184	Katie Short	David Daleiden			8/23/13 8:06 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding criminal prosecution and criminal law and procedure.	
185	Katie Short	David Daleiden			8/23/13 8:11 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding criminal prosecution and criminal law and procedure.	
186	David Daleiden	Katie Short			8/23/13 8:15 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods, criminal prosecution and criminal law and procedure.	
187	Dana Cody	David Daleiden			8/24/13 4:23 AM	Attorney-Client	Confidential email reflecting client information for counsel to provide legal advice regarding investigative journalism methods and nonprofit partnerships and collaborations.	
190	David Daleiden	Dana Cody			8/26/13 7:08 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	Some Redactions
191	Dana Cody	David Daleiden			8/26/13 7:20 PM	Attorney-Client	Confidential email requesting client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	Some Redactions
192	David Daleiden	Casey Mattox			8/27/13 8:19 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
193	Casey Mattox	David Daleiden			8/27/13 8:29 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding legality of fetal tissue procurement practices.	
195	David Daleiden	Dana Cody	Mary Riley		9/4/13 5:17 PM	Attorney-Client	Confidential email regarding obtaining legal advice from counsel.	
196	David Daleiden	Phill Kline, Hannah Tomlinson			9/13/13 9:08 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices.	
199	Hannah Tomlinson	David Daleiden	Phill Kline		9/13/13 9:22 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
200	Phill Kline	David Daleiden	Phill Kline, Hannah Tomlinson		9/13/13 10:00 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
201	David Daleiden	Phill Kline	Phill Kline, Hannah Tomlinson		9/13/13 10:16 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices.	
202	Phill Kline	David Daleiden, Hannah Tomlinson			9/13/13 10:24 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
203	David Daleiden	Phill Kline	Hannah Tomlinson		9/13/13 11:07 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
204	Phill Kline	David Daleiden	Hannah Tomlinson		9/14/13 2:11 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
205	Hannah Tomlinson	Phill Kline	David Daleiden		9/14/13 2:22 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
206	David Daleiden	Hannah Tomlinson	Phill Kline		9/18/13 3:19 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
207	Phill Kline	David Daleiden	Hannah Tomlinson		9/18/13 3:28 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
208	Phill Kline	David Daleiden, Hannah Tomlinson			9/18/13 12:20 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
209	Hannah Tomlinson	David Daleiden			9/18/13 1:09 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
210	David Daleiden	Phill Kline	Hannah Tomlinson		9/18/13 1:51 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
211	David Daleiden	Hannah Tomlinson			9/18/13 2:01 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
212	David Daleiden	Phill Kline			9/18/13 2:02 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
213	Phill Kline	David Daleiden, Phill Kline	Hannah Tomlinson		9/18/13 2:08 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
216	Hannah Tomlinson	Phill Kline, David Daleiden			9/19/13 2:29 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding legality of fetal tissue procurement practices.	
217	Hannah Tomlinson	David Daleiden	Phill Kline		9/19/13 3:54 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding legality of fetal tissue procurement practices.	
218	Phill Kline	David Daleiden			9/21/13 11:20 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods.	
219	David Daleiden	Phill Kline, Hannah Tomlinson			9/21/13 11:30 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding fetal tissue procurement methods.	
222	David Daleiden	Phill Kline			9/25/13 9:30 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices.	
223	Phill Kline	David Daleiden			9/25/13 9:54 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	Some Redactions
224	David Daleiden	Phill Kline			9/25/13 10:00 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	Some Redactions
225	David Daleiden	Phill Kline			9/25/13 10:46 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	Some Redactions
226	Phill Kline	David Daleiden			9/25/13 10:46 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	Some Redactions
227	David Daleiden	Phill Kline			9/26/13 4:54 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices.	
228	David Daleiden	Phill Kline			9/26/13 4:55 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices.	
229					9/26/13 4:55 PM	Attorney-Client	Audio file relating to above-email.	
231	David Daleiden	David Daleiden		Elizabeth Shearer, Annamarie Bettisworth, Albin Rhomberg, Phill Kline	9/26/13 10:39 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
232	Casey Mattox	David Daleiden			9/27/13 3:23 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding overall project goals.	
233	David Daleiden	Casey Mattox			9/27/13 4:42 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding overall project goals.	
234	David Daleiden	Casey Mattox			9/30/13 11:10 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding overall project goals.	
235	David Daleiden	Phill Kline			9/30/13 11:14 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices.	
236	Casey Mattox	David Daleiden			10/1/13 1:30 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding overall project goals.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
237	Phill Kline	David Daleiden			10/1/13 5:49 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
238	David Daleiden	Phill Kline			10/1/13 6:04 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices.	
239	David Daleiden	Casey Mattox			10/1/13 6:11 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding overall project goals.	
240	Phill Kline	David Daleiden			10/1/13 9:07 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
241	Casey Mattox	David Daleiden			10/1/13 4:01 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding overall project goals.	
242	David Daleiden	Casey Mattox			10/2/13 2:24 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding overall project goals.	
243	David Daleiden	Phill Kline			10/2/13 2:25 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	Some Redactions
244	Casey Mattox	David Daleiden			10/2/13 7:34 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding overall project goals.	Some Redactions
245	Phill Kline	David Daleiden			10/2/13 8:28 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding overall project.	
246	David Daleiden	Phill Kline, Casey Mattox			10/3/13 5:36 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding overall project goals.	
247	David Daleiden	Phill Kline			10/8/13 2:26 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices.	
248	David Daleiden	Casey Mattox			10/8/13 2:27 AM	Attorney-Client	Confidential email requesting advice of counsel regarding legality of fetal tissue procurement practices.	
249	Casey Mattox	David Daleiden			10/8/13 2:46 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	Some Redactions
250	Phill Kline	David Daleiden			10/8/13 1:18 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	Some Redactions
251	David Daleiden	Phill Kline			10/8/13 6:34 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	Some Redactions
252	Phill Kline	David Daleiden			10/8/13 6:59 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	Some Redactions
253	David Daleiden	Phill Kline			10/8/13 8:08 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	Some Redactions
254	Phill Kline	David Daleiden			10/8/13 11:35 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	Some Redactions
255	David Daleiden	Phill Kline			10/9/13 1:39 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	Some Redactions
256	David Daleiden	Phill Kline			10/10/13 1:55 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices.	
259	Phill Kline	David Daleiden			10/10/13 8:23 AM	Attorney-Client	Confidential email providing legal advice of counsel regarding legality of fetal tissue procurement practices.	
260	Casey Mattox	David Daleiden			10/10/13 8:35 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding overall project goals.	
261	David Daleiden	Casey Mattox			10/10/13 8:50 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding overall project goals.	
262	David Daleiden	Phill Kline			10/14/13 8:44 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices.	
263	Phill Kline	David Daleiden			10/14/13 11:06 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding contracts.	
264	Casey Mattox	David Daleiden	Phill Kline		10/15/13 2:32 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding overall project goals.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
265	Casey Mattox	Casey Mattox, David Daleiden	Phill Kline		10/15/13 2:33 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding overall project goals.	
266	Phill Kline	David Daleiden			10/22/13 2:21 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
267	David Daleiden	Phill Kline			10/23/13 3:29 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	
268	David Daleiden	Phill Kline			10/23/13 8:52 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	Some Redactions
269	Phill Kline	David Daleiden			10/23/13 9:54 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	Some Redactions
270	David Daleiden	Phill Kline			10/23/13 9:59 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	
272	Phill Kline	David Daleiden			10/23/13 10:01 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	
273	David Daleiden	Phill Kline			10/23/13 10:05 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	Some Redactions
274	Phill Kline	David Daleiden			10/23/13 10:06 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	Some Redactions
275	David Daleiden	Phill Kline			10/23/13 10:07 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	Some Redactions
276	Phill Kline	David Daleiden			10/23/13 10:12 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	Some Redactions
277	David Daleiden	Casey Mattox			10/23/13 11:06 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding contract law.	
279	David Daleiden	Phill Kline			10/24/13 4:34 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	Some Redactions
280	David Daleiden	Casey Mattox			10/24/13 5:03 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding contract law.	
282	Mail Delivery Subsystem	David Daleiden			10/24/13 5:04 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding contract law.	
283	David Daleiden	Phill Kline			10/24/13 5:05 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of confidentiality agreements.	
285	David Daleiden	Casey Mattox			10/24/13 5:12 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding contract law.	
287	Casey Mattox	David Daleiden			10/24/13 5:17 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding contract law.	
288	Phill Kline	David Daleiden			10/24/13 8:36 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	Some Redactions
289	David Daleiden	Phill Kline			10/24/13 8:58 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	Some Redactions
290	Phill Kline	David Daleiden			10/24/13 11:07 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding contracts.	
294	David Daleiden	Casey Mattox			10/25/13 6:46 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding overall project goals.	
295	David Daleiden	Phill Kline			10/28/13 4:09 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	
296	Phill Kline	David Daleiden			10/28/13 11:59 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	Some Redactions

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
297	David Daleiden	Phill Kline			10/28/13 3:12 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	Some Redactions
298	David Daleiden	Dana Cody, Katie Short			10/29/13 9:00 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and nondisclosure agreement.	
301	David Daleiden	Phill Kline			10/29/13 10:36 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	Some Redactions
302	David Daleiden	Phill Kline			10/30/13 12:27 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	
306	David Daleiden	Phill Kline			10/30/13 12:30 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	
309	David Daleiden	Phill Kline			10/30/13 12:32 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	
320	David Daleiden	Phill Kline			10/30/13 12:37 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	
357	David Daleiden	Phill Kline			10/30/13 12:42 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	
749	David Daleiden	Phill Kline			10/30/13 12:44 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	
785	David Daleiden	Phill Kline			10/30/13 12:46 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	
786					10/30/13 12:46 AM	Attorney-Client	Text document relating to above-email.	
788	David Daleiden	Phill Kline			10/30/13 12:49 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	
789	David Daleiden	Phill Kline			10/30/13 6:20 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	Some Redactions
790	Phill Kline	David Daleiden			10/30/13 6:59 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	Some Redactions
791	Phill Kline	David Daleiden			10/30/13 8:22 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	
792	David Daleiden	Dana Cody		Marcella Ketelhut, Phill Kline, Albin Rhomberg	10/30/13 11:33 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding client-attorney representation and legal strategy.	
793	Dana Cody	David Daleiden			10/31/13 1:39 AM	Attorney-Client	Confidential email regarding providing legal advice of counsel regarding client-attorney representation and legal strategy.	
794	David Daleiden	Phill Kline			10/31/13 3:21 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	
795	David Daleiden	Dana Cody			10/31/13 3:39 AM	Attorney-Client	Confidential email regarding obtaining legal advice of counsel regarding client-attorney representation and legal strategy.	
796	Dana Cody	David Daleiden			11/1/13 5:46 PM	Attorney-Client	Confidential email requesting information from client for counsel to provide legal advice regarding and the legality of fetal tissue procurement practices.	
797	David Daleiden	Dana Cody			11/1/13 6:23 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
798	Dana Cody	David Daleiden			11/1/13 8:53 PM	Attorney-Client	Confidential email regarding providing legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
799	David Daleiden	Dana Cody			11/1/13 9:47 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
800	David Daleiden	Phill Kline			11/1/13 9:51 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
801	Phill Kline	David Daleiden,Phill Kline			11/3/13 2:32 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	
802	David Daleiden	Phill Kline			11/4/13 3:56 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	Some Redactions
803	David Daleiden	Phill Kline			11/4/13 8:34 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	Some Redactions
804	Phill Kline	David Daleiden			11/5/13 1:09 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	Some Redactions
805	David Daleiden	Phill Kline			11/5/13 6:50 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	Some Redactions
806	Phill Kline	David Daleiden			11/5/13 1:30 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices and contracts.	Some Redactions
922	David Daleiden	Phill Kline	Hannah Tomlinson		11/13/13 12:22 AM	Attorney-Client	Confidential email regarding legal strategy of counsel regarding investigative journalism method.	
923	Phill Kline	David Daleiden,Phill Kline	Hannah Tomlinson		11/13/13 12:58 AM	Attorney-Client	Confidential email regarding legal strategy of counsel regarding investigative journalism method.	
924	Hannah Tomlinson	Phill Kline	David Daleiden, Phill Kline		11/13/13 3:38 AM	Attorney-Client	Confidential email regarding legal strategy of counsel regarding investigative journalism method.	
925	Hannah Tomlinson	David Daleiden	Phill Kline		11/13/13 3:20 PM	Attorney-Client	Confidential email requesting legal advice and strategy of counsel regarding investigative journalism method.	
926	David Daleiden	Hannah Tomlinson			11/14/13 12:37 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices.	
965	David Daleiden	Hannah Tomlinson	Phill Kline		11/14/13 12:39 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices.	
966	David Daleiden	Hannah Tomlinson	Phill Kline		11/14/13 12:41 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices.	
967	Hannah Tomlinson	David Daleiden	Phill Kline		11/14/13 1:20 AM	Attorney-Client	Confidential email regarding legal advice of counsel regarding legality of fetal tissue procurement practices	
968	David Daleiden	Hannah Tomlinson	Phill Kline		11/15/13 9:51 AM	Attorney-Client	Confidential email regarding legal advice of counsel regarding legality of fetal tissue procurement practices and investigative journalism methods.	
969	Hannah Tomlinson	David Daleiden	Phill Kline		11/15/13 2:39 PM	Attorney-Client	Confidential email regarding legal advice of counsel regarding legality of fetal tissue procurement practices.	
970	David Daleiden	Hannah Tomlinson	Phill Kline		11/15/13 3:56 PM	Attorney-Client	Confidential email regarding legal advice of counsel regarding investigative journalism methods.	
971	Hannah Tomlinson	David Daleiden			11/15/13 4:01 PM	Attorney-Client	Confidential email regarding legal advice of counsel regarding investigative journalism methods.	
972	Dana Cody	Hannah Tomlinson,David Daleiden	Phill Kline		11/15/13 9:01 PM	Attorney-Client	Confidential email regarding legal advice of counsel regarding investigative journalism methods.	
973	David Daleiden	Dana Cody			11/16/13 9:22 AM	Attorney-Client	Confidential email regarding legal advice of counsel regarding investigative journalism methods.	
974	David Daleiden	Phill Kline, Hannah Tomlinson			11/18/13 8:46 PM	Attorney-Client	Confidential email regarding legal advice of counsel regarding investigative journalism methods.	
975	David Daleiden	Dana Cody			11/18/13 8:47 PM	Attorney-Client	Confidential email regarding legal advice of counsel regarding investigative journalism methods.	
976	Phill Kline	David Daleiden			11/18/13 9:30 PM	Attorney-Client	Confidential email regarding legal advice of counsel regarding investigative journalism methods.	
977	David Daleiden	Phill Kline			11/18/13 11:46 PM	Attorney-Client	Confidential email regarding legal advice of counsel regarding investigative journalism methods.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
978	Dana Cody	David Daleiden			11/19/13 12:52 AM	Attorney-Client	Confidential email regarding legal advice of counsel regarding investigative journalism methods.	
979	Dana Cody	David Daleiden			11/19/13 6:08 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding nondisclosure agreement.	
980	David Daleiden	Dana Cody			11/20/13 8:42 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding nonprofit corporations, legal representation, and attorney-client relationships.	
981	David Daleiden	Phill Kline			11/20/13 9:02 PM	Attorney-Client	Confidential email regarding legal advice of counsel regarding investigative journalism methods.	
982	Dana Cody	David Daleiden			11/20/13 9:45 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
983	Dana Cody	David Daleiden,Phill Kline, Hannah Tomlinson			11/20/13 10:10 PM	Attorney-Client	Confidential email regarding legal advice of counsel regarding enforcement of confidentiality agreement.	
984	David Daleiden	Dana Cody			11/20/13 10:59 PM	Attorney-Client	Confidential email regarding legal advice of counsel regarding enforcement of confidentiality agreement.	
985	Phill Kline	Dana Cody,David Daleiden,Hannah Tomlinson			11/20/13 11:07 PM	Attorney-Client	Confidential email regarding legal advice of counsel regarding enforcement of confidentiality agreement.	
986	David Daleiden	Phill Kline	Dana Cody, Hannah Tomlinson		11/22/13 8:18 AM	Attorney-Client	Confidential email regarding legal advice of counsel regarding legality and enforcement of confidentiality agreement.	
989					11/22/13 8:18 AM	Attorney-Client	Word document relating to above-email.	
991	David Daleiden	Phill Kline			11/22/13 8:24 AM	Attorney-Client	Confidential email regarding legal advice of counsel regarding investigative journalism methods and legality/enforcement of confidentiality agreement.	
992	Dana Cody	David Daleiden, Phill Kline	Hannah Tomlinson		11/22/13 8:08 PM	Attorney-Client	Confidential email regarding legal advice of counsel regarding enforcement of confidentiality agreement.	
993	Kevin Bedolla	David Daleiden	Dana Cody		11/23/13 7:20 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
994	David Daleiden	Kevin Bedolla	Dana Cody		11/23/13 9:02 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
995					11/23/13 9:02 PM	Attorney-Client	PDF document relating to above-email.	
996	Kevin Bedolla	David Daleiden	Dana Cody		11/23/13 10:44 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
997	David Daleiden	Kevin Bedolla	Dana Cody		11/23/13 11:00 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
998	David Daleiden	Phill Kline	Hannah Tomlinson		11/24/13 6:27 PM	Attorney-Client	Confidential email regarding legal advice of counsel regarding enforcement of confidentiality agreement and legal strategy.	
999	Phill Kline	David Daleiden			11/24/13 11:15 PM	Attorney-Client	Confidential email regarding legal advice of counsel regarding enforceability and validity of confidentiality agreement.	
1000	David Daleiden	Phill Kline			11/24/13 11:21 PM	Attorney-Client	Confidential email regarding legal advice of counsel regarding enforceability of confidentiality agreement	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1001	David Daleiden	Phill Kline	Phill Kline		11/25/13 4:42 AM	Attorney-Client	Confidential email regarding legal advice of counsel regarding investigative journalism methods and legal strategy.	
1002	Hannah Tomlinson	David Daleiden			11/25/13 5:30 AM	Attorney-Client	Confidential email regarding legal advice of counsel regarding investigative journalism methods.	
1003	David Daleiden	Phill Kline			12/2/13 10:09 PM	Attorney-Client	Confidential email setting up time to request legal advice of counsel regarding investigative journalism methods.	
1007	David Daleiden	Phill Kline			12/3/13 9:05 PM	Attorney-Client	Confidential email setting up time to request legal advice of counsel regarding investigative journalism methods.	
1008	Phill Kline	David Daleiden			12/4/13 12:14 AM	Attorney-Client	Confidential email setting up time to request legal advice of counsel regarding investigative journalism methods.	Some Redactions
1009	David Daleiden	Phill Kline			12/4/13 12:17 AM	Attorney-Client	Confidential email setting up time to request legal advice of counsel regarding investigative journalism methods.	Some Redactions
1013	David Daleiden	Kevin Bedolla, Phill Kline, Hannah Tomlinson			12/11/13 4:09 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods.	
1014					12/11/13 4:09 AM	Attorney-Client	PDF document relating to above-email.	
1015	David Daleiden	Dana Cody			12/11/13 6:48 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding nonprofit corporations.	
1016	Dana Cody	David Daleiden			12/11/13 8:24 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding nonprofit corporations.	
1017	David Daleiden	Dana Cody			12/11/13 11:31 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding nonprofit corporations, legal representation, and attorney-client relationships,	
1018	David Daleiden	Kevin Bedolla	Phill Kline, Hannah Tomlinson		12/12/13 12:38 AM	Attorney-Client	Confidential email reflecting client information for counsel to provide legal advice regarding investigative journalism methods.	
1019	Dana Cody	David Daleiden			12/12/13 2:47 AM	Attorney-Client	Confidential email requesting information from client for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1020	David Daleiden	Phill Kline, Hannah Tomlinson			12/12/13 11:20 PM	Attorney-Client	Confidential email regarding legal advice of counsel regarding legality of fetal tissue procurement practices.	
1021	Hannah Tomlinson	David Daleiden	Phill Kline		12/13/13 7:49 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices.	
1022	David Daleiden	Hannah Tomlinson	Phill Kline		12/17/13 6:50 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices.	
1023	David Daleiden			Albin Rhomberg, Jim Holman, Dana Cody, Phill Kline, Hannah Tomlinson, Kevin Bedolla, Elizabeth Shearer	12/18/13 11:26 AM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email containing client information for counsel to provide legal advice regarding fetal tissue procurement methods.	
1024	Dana Cody	David Daleiden			12/18/13 1:52 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding legal rules of professional conduct.	
1025	David Daleiden	Hannah Tomlinson	Phill Kline		12/20/13 7:13 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices.	
1026	Hannah Tomlinson	David Daleiden			12/21/13 2:03 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices.	
1027	David Daleiden	Hannah Tomlinson			12/23/13 3:06 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices.	
1028	Hannah Tomlinson	David Daleiden	Phill Kline		12/23/13 3:59 PM	Attorney-Client	Confidential email regarding counsel's legal memorandum.	
1029	Kevin Bedolla	David Daleiden			12/23/13 5:56 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods and nonprofit corporations.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1030	Dana Cody	David Daleiden			12/23/13 6:37 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding legal representation, and attorney-client relationships.	
1031	Casey Mattox	David Daleiden			12/23/13 11:52 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding overall project goals.	
1032	David Daleiden	Casey Mattox			12/23/13 11:52 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding contract law.	
1033	Casey Mattox	David Daleiden			12/24/13 2:44 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding contract law.	
1034	David Daleiden	Casey Mattox			12/24/13 2:53 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding contract law.	
1035	David Daleiden	Casey Mattox			12/30/13 9:41 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding overall project goals.	
1036	David Daleiden	Phill Kline	Hannah Tomlinson		12/30/13 9:43 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods.	
1037	David Daleiden	Dana Cody			12/30/13 9:45 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	Some Redactions
1038	Casey Mattox	David Daleiden			12/30/13 1:00 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding overall project goals.	
1039	Dana Cody	David Daleiden			12/30/13 4:32 PM	Attorney-Client	Confidential email regarding providing legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	Some Redactions
1040	Phill Kline	David Daleiden			12/31/13 12:39 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods.	Some Redactions
1041	David Daleiden	Phill Kline			12/31/13 2:25 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods.	Some Redactions
1042	Phill Kline	David Daleiden			12/31/13 4:46 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods.	Some Redactions
1043	Casey Mattox	David Daleiden			12/31/13 5:11 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
1044	David Daleiden	Casey Mattox			12/31/13 6:06 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
1045	David Daleiden	Phill Kline			12/31/13 6:08 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods.	Some Redactions
1046	Casey Mattox	David Daleiden			12/31/13 8:51 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
1047	Casey Mattox	David Daleiden			1/3/14 2:08 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and contract law.	
1048	David Daleiden	Phill Kline	Hannah Tomlinson		1/7/14 12:09 PM	Attorney-Client	Confidential email reflecting information client is providing to counsel to obtain legal advice regarding legality of fetal tissue procurement practices and investigative journalism methods.	
1051	David Daleiden	Phill Kline	Hannah Tomlinson		1/7/14 12:15 PM	Attorney-Client	Confidential email reflecting information client is providing to counsel to obtain legal advice regarding legality of fetal tissue procurement practices and investigative journalism methods.	
1052	Phill Kline	David Daleiden			1/7/14 1:19 PM	Attorney-Client	Confidential email reflecting information client is providing to counsel to obtain legal advice regarding legality of fetal tissue procurement practices and investigative journalism methods.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1053	David Daleiden	Phill Kline			1/7/14 10:01 PM	Attorney-Client	Confidential email reflecting information client is providing to counsel to obtain legal advice regarding legality of fetal tissue procurement practices and investigative journalism methods.	
1054	David Daleiden	Dana Cody			1/15/14 1:13 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	Some Redactions
1055	Hannah Tomlinson	David Daleiden			1/16/14 2:15 AM	Attorney-Client	Confidential email requesting information from client regarding investigative journalism methods.	
1056	Dana Cody	David Daleiden			1/20/14 3:31 AM	Attorney-Client	Confidential email regarding providing legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
1057	Dana Cody	David Daleiden			1/20/14 5:18 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	Some Redactions
1058	David Daleiden	Dana Cody			1/20/14 5:18 AM	Attorney-Client	Confidential email regarding providing legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
1059	David Daleiden	Hannah Tomlinson			1/20/14 5:26 AM	Attorney-Client	Confidential email requesting information from client regarding investigative journalism methods.	
1060	David Daleiden	Phill Kline	Hannah Tomlinson		1/27/14 3:48 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods.	
1061	Phill Kline	David Daleiden	Hannah Tomlinson		1/27/14 4:55 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods.	
1062	David Daleiden	Phill Kline	Hannah Tomlinson		1/27/14 5:03 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods.	Some Redactions
1063	Phill Kline	David Daleiden	Hannah Tomlinson		1/27/14 11:36 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods.	Some Redactions
1064	David Daleiden	Phill Kline	Hannah Tomlinson		1/27/14 7:08 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods.	Some Redactions
1065	Phill Kline	Hannah Tomlinson	David Daleiden		1/29/14 12:11 AM	Attorney-Client	Confidential email reflecting legal advice of counsel regarding investigative journalism methods.	
1066	David Daleiden	Phill Kline, Hannah Tomlinson			1/29/14 8:33 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods and criminal investigations.	
1067	David Daleiden	Phill Kline, Hannah Tomlinson			1/29/14 9:50 AM	Attorney-Client	Confidential email providing client information to obtain legal advice of counsel regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1069	David Daleiden	Claude Allen	Phill Kline		1/29/14 10:03 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding investigative journalism methods	
1070	Claude Allen	David Daleiden			1/29/14 2:40 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding investigative journalism methods	Some Redactions

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1071	Hannah Tomlinson	David Daleiden	Phill Kline		1/29/14 4:31 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1072	Hannah Tomlinson	David Daleiden	Phill Kline		1/29/14 4:33 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1073	David Daleiden	Claude Allen			1/29/14 5:06 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding investigative journalism methods and arrangements	Some Redactions
1074	David Daleiden	Claude Allen	Ray Ruddy	David Daleiden, Phill Kline	1/30/14 10:16 AM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding investigative journalism methods and legality of fetal tissue procurement practices	
1076					1/30/14 10:16 AM	Attorney-Client Privilege; Common Interest Doctrine	PDF document relating to above-email.	
1077					1/30/14 10:16 AM	Attorney-Client Privilege; Common Interest Doctrine	PDF document relating to above-email.	
1078					1/30/14 10:16 AM	Attorney-Client Privilege; Common Interest Doctrine	PDF document relating to above-email.	
1079	David Daleiden	Hannah Tomlinson	Phill Kline		1/30/14 10:29 AM	Attorney-Client	Confidential email reflecting legal advice of counsel regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1080	David Daleiden	Phill Kline			1/30/14 10:32 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods.	
1081	David Daleiden	Phill Kline	Hannah Tomlinson		1/30/14 10:42 AM	Attorney-Client	Confidential email reflecting client information for counsel to provide legal advice regarding investigative journalism methods.	
1083					1/30/14 10:42 AM	Attorney-Client	PDF document relating to above-email.	
1084	Phill Kline	David Daleiden			1/30/14 11:24 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods.	
1085	David Daleiden	Phill Kline	Hannah Tomlinson		2/3/14 5:04 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods.	
1086	Phill Kline	David Daleiden, Phill Kline	Hannah Tomlinson		2/3/14 5:51 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods.	
1087	David Daleiden	Phill Kline	Phill Kline, Hannah Tomlinson		2/3/14 6:07 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods.	
1088	Hannah Tomlinson	Phill Kline, David Daleiden			2/4/14 2:06 AM	Attorney-Client	Confidential email reflecting legal advice of counsel regarding investigative journalism methods.	
1090	Hannah Tomlinson	Phill Kline, David Daleiden	Hannah Tomlinson		2/4/14 8:07 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods.	
1091	David Daleiden	Hannah Tomlinson	Phill Kline		2/4/14 8:19 PM	Attorney-Client	Confidential email reflecting legal advice of counsel regarding investigative journalism methods.	
1092	David Daleiden	Phill Kline, Hannah Tomlinson			2/6/14 4:37 AM	Attorney-Client	Confidential email providing reflecting legal advice of counsel regarding investigative journalism methods.	
1093	David Daleiden	Phill Kline, Hannah Tomlinson			2/6/14 4:51 AM	Attorney-Client	Confidential email providing client information to obtain legal advice of counsel regarding investigative journalism methods.	
1096	David Daleiden	Phill Kline	Hannah Tomlinson		2/8/14 12:30 AM	Attorney-Client	Confidential email providing client information to obtain legal advice of counsel regarding investigative journalism methods.	
1097					2/8/14 12:30 AM	Attorney-Client	Audio file relating to above-email.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1098	David Daleiden	Phill Kline	Hannah Tomlinson		2/8/14 12:32 AM	Attorney-Client	Confidential email providing client information to obtain legal advice of counsel regarding investigative journalism methods.	
1099	David Daleiden	Phill Kline, Hannah Tomlinson			2/8/14 12:36 AM	Attorney-Client	Confidential email providing client information to obtain legal advice of counsel regarding investigative journalism methods.	
1102	Hannah Tomlinson	David Daleiden	Phill Kline		2/11/14 3:06 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods.	
1104	Hannah Tomlinson	Phill Kline, David Daleiden			2/15/14 2:37 AM	Attorney-Client	Confidential email requesting client information to provide legal advice of counsel regarding investigative journalism methods.	
1105					2/15/14 2:37 AM	Attorney-Client	Word document relating to above-email.	
1106	David Daleiden	Hannah Tomlinson	Phill Kline		2/15/14 7:50 AM	Attorney-Client	Confidential email reflecting client information for counsel to provide legal advice regarding investigative journalism methods.	
1107	David Daleiden	Hannah Tomlinson, Phill Kline			2/18/14 3:39 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods.	
1108	David Daleiden	Claude Allen			2/19/14 5:42 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
1109	Claude Allen	David Daleiden			2/20/14 1:24 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding planning	Some Redactions
1110	David Daleiden	Claude Allen	Ray Ruddy	Phill Kline	2/21/14 9:16 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding investigative journalism methods and regarding nonprofit corporations	
1112					2/21/14 9:16 PM	Attorney-Client Privilege; Common Interest Doctrine	PDF document relating to above-email.	
1113	David Daleiden	Phill Kline, Hannah Tomlinson			2/21/14 9:36 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods.	
1114	David Daleiden	Phill Kline			2/21/14 9:37 PM	Attorney-Client	Confidential email regarding setting up time to request legal advice of counsel regarding investigative journalism study.	
1115	Hannah Tomlinson	David Daleiden	Phill Kline		2/21/14 11:12 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods.	
1116	Phill Kline	David Daleiden			2/22/14 8:47 PM	Attorney-Client	Confidential email regarding setting up time to request legal advice of counsel regarding investigative journalism study.	Some Redactions
1117	David Daleiden	Phill Kline			2/22/14 8:55 PM	Attorney-Client	Confidential email regarding setting up time to request legal advice of counsel regarding investigative journalism study.	Some Redactions
1118	Phill Kline	David Daleiden	Hannah Tomlinson		2/23/14 7:47 PM	Attorney-Client	Confidential email regarding setting up time to request legal advice of counsel regarding investigative journalism study.	
1119	David Daleiden	Phill Kline	Hannah Tomlinson		2/25/14 1:47 AM	Attorney-Client	Confidential email regarding setting up time to request legal advice of counsel regarding investigative journalism study.	
1121	David Daleiden	Phill Kline, Hannah Tomlinson			2/26/14 12:35 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods.	
1122	Phill Kline	David Daleiden, Hannah Tomlinson			2/26/14 11:22 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1123	Hannah Tomlinson	David Daleiden			2/26/14 4:17 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods.	
1124	David Daleiden	Claude Allen	Ray Ruddy		2/26/14 7:04 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods.	
1125	David Daleiden	Phill Kline	Hannah Tomlinson		2/26/14 7:16 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods.	
1126	Phill Kline	David Daleiden			2/26/14 7:21 PM	Attorney-Client	Confidential email requesting legal advice and containing client information for counsel to provide legal advice regarding investigative journalism methods.	Some Redactions
1127	David Daleiden	Phill Kline			2/26/14 7:27 PM	Attorney-Client	Confidential emails requesting legal advice and containing client information for counsel to provide legal advice regarding investigative journalism methods.	Some Redactions
1128	Phill Kline	David Daleiden			2/26/14 8:16 PM	Attorney-Client	Confidential emails that request legal advice and contain client information for counsel to provide legal advice regarding investigative journalism methods.	Some Redactions
1129	Ray Ruddy	David Daleiden, Claude Allen			2/26/14 9:07 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods.	
1130	David Daleiden	Phill Kline, Hannah Tomlinson			2/26/14 9:45 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding nonprofit corporations.	
1131	Hannah Tomlinson	David Daleiden, Phill Kline	Phill Kline		2/26/14 11:46 PM	Attorney-Client	Confidential email requesting legal advice and containing client information for counsel to provide legal advice regarding investigative journalism methods.	
1132	David Daleiden	Hannah Tomlinson	Phill Kline		2/27/14 12:19 AM	Attorney-Client	Confidential emails that request legal advice and contain client information for counsel to provide legal advice regarding investigative journalism methods.	
1133	Hannah Tomlinson	David Daleiden	Phill Kline		2/27/14 2:01 AM	Attorney-Client	Confidential emails that request legal advice and contain client information for counsel to provide legal advice regarding investigative journalism methods.	
1134	David Daleiden	Ray Ruddy	Claude Allen, Phill Kline	REDACTED, Father Claude Williams	2/27/14 7:26 AM	Attorney-Client Privilege; Psychotherapist-Patient Privilege; Clergy-Communicant Privilege	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and nonprofit corporations.	
1135	David Daleiden	Albin Rhomberg			2/27/14 8:02 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and nonprofit corporations.	
1136	Ray Ruddy	David Daleiden	Claude Allen, Phill Kline		2/27/14 1:45 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and nonprofit corporations.	
1137	Phill Kline	Ray Ruddy	Claude Allen, Hannah Tomlinson		2/27/14 2:01 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email regarding providing legal advice of counsel regarding investigative journalism methods.	Some Redactions
1138	Ray Ruddy	Phill Kline, David Daleiden	Claude Allen, Hannah Tomlinson		2/27/14 3:10 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email regarding providing legal advice of counsel regarding investigative journalism methods.	Some Redactions
1139	Phill Kline	Ray Ruddy, David Daleiden	Claude Allen, Hannah Tomlinson		2/27/14 3:14 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email regarding providing legal advice of counsel regarding investigative journalism methods.	Some Redactions

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1140	Claude Allen	Phill Kline, Ray Ruddy, David Daleiden	Hannah Tomlinson		2/27/14 8:04 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods.	Some Redactions
1144	Hannah Tomlinson	David Daleiden	Phill Kline		2/28/14 8:15 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods.	
1145					2/28/14 8:15 PM	Attorney-Client	Word document relating to above-email.	
1154	David Daleiden	Claude Allen, Ray Ruddy	Phill Kline		3/4/14 2:53 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding arrangements	
1155	David Daleiden	Phill Kline, Hannah Tomlinson			3/4/14 3:25 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods.	
1156	David Daleiden	Claude Allen			3/4/14 3:32 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
1157	Hannah Tomlinson	David Daleiden	Phill Kline		3/4/14 3:34 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods.	
1158	Claude Allen	David Daleiden			3/4/14 3:57 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
1159	David Daleiden	Claude Allen			3/4/14 9:23 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
1160	David Daleiden	Hannah Tomlinson	Phill Kline		3/5/14 6:24 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods.	
1161	Hannah Tomlinson	David Daleiden	Phill Kline		3/5/14 2:57 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods.	
1162	Phill Kline	David Daleiden	Hannah Tomlinson		3/5/14 11:52 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods.	
1163	David Daleiden			Phill Kline, Hannah Tomlinson, Annamarie Bettisworth, Brianna Baxter, Albin Rhomberg, Justin Dugyon, Father Claude Williams	3/10/14 5:56 AM	Attorney-Client Privilege; Clergy-Communicant Privilege	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
1166	Hannah Tomlinson	David Daleiden	Phill Kline		3/10/14 10:12 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods.	
1167	Hannah Tomlinson	David Daleiden			3/11/14 5:04 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods.	
1169	Hannah Tomlinson	Phill Kline	David Daleiden		3/18/14 5:59 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods.	
1174	David Daleiden	Phill Kline, Hannah Tomlinson			3/22/14 2:20 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods.	
1176	Phill Kline	David Daleiden, Hannah Tomlinson			3/22/14 9:54 AM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1177	David Daleiden	Phill Kline	Hannah Tomlinson		3/22/14 9:11 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods.	
1179	David Daleiden	Phill Kline, Hannah Tomlinson			4/1/14 4:47 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods.	
1181	David Daleiden	Phill Kline, Hannah Tomlinson			4/1/14 4:52 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods.	
1183	Phill Kline	David Daleiden, Hannah Tomlinson			4/1/14 4:52 PM	Attorney-Client	Confidential emails reflecting information for client to obtain legal advice regarding investigative journalism methods.	Some Redactions
1184	David Daleiden	Phill Kline, Hannah Tomlinson			4/1/14 4:52 PM	Attorney-Client	Confidential emails reflecting client information for counsel to provide legal advice regarding investigative journalism methods.	
1186	David Daleiden	Phill Kline	Hannah Tomlinson		4/1/14 4:54 PM	Attorney-Client	Confidential emails reflecting client information for counsel to provide legal advice regarding investigative journalism methods.	Some Redactions
1187	Phill Kline	David Daleiden			4/1/14 4:55 PM	Attorney-Client	Confidential emails reflecting client information for counsel to provide legal advice regarding investigative journalism methods.	Some Redactions
1188	Hannah Tomlinson	Phill Kline	David Daleiden		4/1/14 4:56 PM	Attorney-Client	Confidential emails reflecting client information for counsel to provide legal advice regarding investigative journalism methods.	Some Redactions
1190	David Daleiden	Phill Kline, Hannah Tomlinson			4/4/14 9:20 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods.	
1192	Phill Kline	David Daleiden, Hannah Tomlinson			4/4/14 9:48 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods.	
1193	David Daleiden	Phill Kline	Hannah Tomlinson		4/4/14 10:13 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods.	
1194	Hannah Tomlinson	David Daleiden	Phill Kline		4/5/14 2:31 AM	Attorney-Client	Confidential emails containing client information for counsel to provide legal advice regarding investigative journalism methods.	
1195	David Daleiden	Hannah Tomlinson	Phill Kline		4/5/14 8:01 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods.	
1197	David Daleiden	Phill Kline, Hannah Tomlinson			4/7/14 9:14 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods.	
1198	Phill Kline	David Daleiden, Hannah Tomlinson			4/7/14 10:20 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods.	
1200	David Daleiden	Hannah Tomlinson	Phill Kline		4/8/14 5:28 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1201	Phill Kline	David Daleiden, Hannah Tomlinson	Phill Kline		4/8/14 5:29 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1202	David Daleiden	Phill Kline	Hannah Tomlinson, Phill Kline		4/9/14 1:23 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1205	David Daleiden	Phill Kline, Hannah Tomlinson			4/12/14 2:13 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1206	David Daleiden	Ray Ruddy, Claude Allen			4/12/14 2:43 AM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
1207	David Daleiden	Ray Ruddy, Claude Allen	Phill Kline, Father Claude Williams, Anna Bettisworth, Albin Rhomberg		4/12/14 2:43 AM	Attorney-Client Privilege; Clergy-Communicant Privilege; Common Interest Doctrine	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices and investigative journalism methods.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1208	Hannah Tomlinson	David Daleiden			4/12/14 8:37 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1211	David Daleiden	Hannah Tomlinson	Phill Kline		4/13/14 6:43 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1212	David Daleiden	Phill Kline, Hannah Tomlinson		Father Claude Williams	4/13/14 7:20 AM	Attorney-Client Privilege; Clergy-Communicant Privilege	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1215	Hannah Tomlinson	David Daleiden	Phill Kline		4/13/14 10:35 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding legality of investigative journalism methods.	
1216	David Daleiden	Claude Allen			4/14/14 8:59 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
1217	David Daleiden	Claude Allen	Ray Ruddy		4/14/14 9:03 AM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding investigative journalism methods	
1219	David Daleiden	Hannah Tomlinson	Phill Kline		4/15/14 11:33 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1220	Hannah Tomlinson	David Daleiden	Phill Kline		4/16/14 1:57 AM	Attorney-Client	Confidential email providing legal advice of counsel regarding legality of investigative journalism methods.	
1222	David Daleiden	Claude Allen			4/17/14 3:36 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding investigative journalism methods	
1223	David Daleiden	Hannah Tomlinson			4/22/14 12:31 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1224	Hannah Tomlinson	David Daleiden			4/22/14 3:29 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1225	David Daleiden	Hannah Tomlinson			4/22/14 10:52 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1226	Hannah Tomlinson	David Daleiden			4/23/14 1:04 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1228	Hannah Tomlinson	David Daleiden, Phill Kline			4/23/14 6:04 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1231	David Daleiden	Hannah Tomlinson, Phill Kline			4/25/14 5:02 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1232					4/25/14 5:02 PM	Attorney-Client	Word document relating to above-email.	
1233	David Daleiden	Hannah Tomlinson, Phill Kline			4/30/14 2:31 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1234	Hannah Tomlinson	David Daleiden	Phill Kline		4/30/14 4:35 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1235	David Daleiden	Hannah Tomlinson	Phill Kline		4/30/14 9:14 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1236	Phill Kline	David Daleiden, Hannah Tomlinson			4/30/14 9:16 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1237	David Daleiden	Phill Kline	Hannah Tomlinson		4/30/14 9:23 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1238	Phill Kline	David Daleiden			4/30/14 9:54 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1239	David Daleiden	Hannah Tomlinson, Phill Kline			5/8/14 10:13 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1240	Hannah Tomlinson	David Daleiden	Phill Kline		5/8/14 10:33 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1241	David Daleiden	Hannah Tomlinson	Phill Kline		5/8/14 10:46 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1242	Hannah Tomlinson	David Daleiden	Phill Kline		5/9/14 12:30 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1243	David Daleiden	Hannah Tomlinson, Phill Kline			5/12/14 9:25 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1244	David Daleiden	Phill Kline, Hannah Tomlinson			5/13/14 9:27 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1245	David Daleiden	Phill Kline, Hannah Tomlinson			5/13/14 11:12 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1247	Phill Kline	David Daleiden	Hannah Tomlinson		5/13/14 11:34 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1248	David Daleiden	Phill Kline	Hannah Tomlinson		5/13/14 1:48 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods.	
1249	David Daleiden	Phill Kline			5/13/14 1:57 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1250	Hannah Tomlinson	David Daleiden			5/13/14 5:02 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1251	Hannah Tomlinson	David Daleiden			5/13/14 5:05 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1252	David Daleiden	Hannah Tomlinson	Phill Kline		5/13/14 8:22 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1253	Hannah Tomlinson	David Daleiden			5/13/14 8:48 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1254	David Daleiden	Hannah Tomlinson			5/13/14 10:17 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1255	Hannah Tomlinson	David Daleiden			5/14/14 2:57 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1256	David Daleiden	Hannah Tomlinson			5/14/14 8:54 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1257	David Daleiden	Phill Kline, Hannah Tomlinson			5/14/14 11:18 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods.	
1258	Hannah Tomlinson	David Daleiden	Phill Kline		5/15/14 1:38 AM	Attorney-Client	Confidential email providing legal advice of counsel regarding fetal tissue procurement practices and contract.	
1259					5/15/14 1:38 AM	Attorney-Client	Text document relating to above-email.	
1260	David Daleiden	Hannah Tomlinson	Phill Kline		5/15/14 1:42 AM	Attorney-Client	Confidential email providing legal advice of counsel regarding fetal tissue procurement practices and contract.	
1261	Hannah Tomlinson	David Daleiden	Phill Kline		5/15/14 3:57 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding fetal tissue procurement practices and contract.	
1263	Phill Kline	David Daleiden, Hannah Tomlinson			5/16/14 2:30 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1264	Hannah Tomlinson	David Daleiden			5/16/14 4:27 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	Some Redactions
1265	David Daleiden	Hannah Tomlinson			5/16/14 4:52 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	Some Redactions
1267	David Daleiden	Phill Kline			5/17/14 12:01 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1268	David Daleiden	Phill Kline	Hannah Tomlinson		5/17/14 12:01 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1270	Hannah Tomlinson	Phill Kline, David Daleiden			5/17/14 6:36 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1271	David Daleiden	Phill Kline, Hannah Tomlinson			5/17/14 7:34 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and contract.	
1276	Hannah Tomlinson	David Daleiden			5/21/14 1:51 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1277	David Daleiden	Phill Kline, Hannah Tomlinson			5/22/14 11:30 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1278					5/22/14 11:30 AM	Attorney-Client	Audio file relating to above-email.	
1279	David Daleiden	Hannah Tomlinson			5/22/14 11:34 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1280	Hannah Tomlinson	David Daleiden			5/22/14 12:32 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1286	David Daleiden	Phill Kline			5/28/14 8:34 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1288	Phill Kline	David Daleiden			5/28/14 11:49 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1289	David Daleiden	Phill Kline			5/28/14 11:53 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1292	David Daleiden	Phill Kline, Hannah Tomlinson			5/30/14 10:37 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods.	
1297	Phill Kline	David Daleiden, Hannah Tomlinson			6/1/14 11:06 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1299	David Daleiden	Hannah Tomlinson, Phill Kline			6/5/14 1:11 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods.	
1300	Hannah Tomlinson	David Daleiden	Phill Kline		6/5/14 2:17 PM	Attorney-Client	Confidential email containing client information to obtain legal advice of counsel regarding investigative journalism methods	
1301	David Daleiden	Hannah Tomlinson	Phill Kline		6/5/14 2:19 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods.	
1302	Hannah Tomlinson	David Daleiden	Phill Kline		6/5/14 2:46 PM	Attorney-Client	Confidential email providing legal advice regarding investigative journalism methods.	
1303	David Daleiden	Phill Kline, Hannah Tomlinson			6/5/14 5:34 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
1304	Hannah Tomlinson	David Daleiden			6/5/14 6:58 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding legality of investigative journalism methods.	
1305	David Daleiden	Phill Kline, Hannah Tomlinson			6/5/14 7:00 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods.	
1306	David Daleiden	Hannah Tomlinson			6/5/14 7:00 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1307	Hannah Tomlinson	David Daleiden			6/5/14 7:25 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding legality of investigative journalism methods.	
1308	Hannah Tomlinson	David Daleiden			6/5/14 7:36 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding legality of investigative journalism methods.	
1309	David Daleiden	Phill Kline, Hannah Tomlinson			6/6/14 12:56 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1318					6/6/14 12:56 PM	Attorney-Client	Word document relating to above-email.	
1319					6/6/14 12:56 PM	Attorney-Client	PDF document relating to above-email.	
1321	David Daleiden	Phill Kline, Hannah Tomlinson			6/6/14 1:19 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1323	Hannah Tomlinson	David Daleiden	Phill Kline		6/6/14 2:01 PM	Attorney-Client	Confidential email providing legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1324	Hannah Tomlinson	David Daleiden	Phill Kline		6/6/14 2:05 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1325	David Daleiden	Phill Kline, Hannah Tomlinson			6/7/14 3:19 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
1326	David Daleiden	Claude Allen		Phill Kline	6/9/14 12:08 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1327	David Daleiden	Claude Allen			6/13/14 1:52 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
1328	David Daleiden	Phill Kline, Hannah Tomlinson			6/13/14 2:01 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1332	David Daleiden	Phill Kline			6/18/14 11:32 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1333	Phill Kline	David Daleiden			6/19/14 1:22 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1334	David Daleiden	Phill Kline			6/19/14 9:55 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1335	David Daleiden	Phill Kline			6/24/14 9:15 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1337	David Daleiden	Hannah Tomlinson	Phill Kline		6/24/14 9:20 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1338	Hannah Tomlinson	David Daleiden	Phill Kline		6/24/14 10:45 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1339	David Daleiden	Hannah Tomlinson	Phill Kline		6/24/14 11:04 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1340	David Daleiden	Phill Kline	Hannah Tomlinson		6/25/14 12:25 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding fetal tissue procurement methods.	
1342	David Daleiden	Phill Kline, Hannah Tomlinson			6/25/14 3:33 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1343	David Daleiden	Claude Allen		Father Claude Williams, Phill Kline	6/25/14 8:49 AM	Attorney-Client Privilege; Clergy-Communicant Privilege	Confidential email providing legal communication with counsel reflecting legal planning	
1344					6/25/14 8:49 AM	Attorney-Client Privilege; Clergy-Communicant Privilege	PDF document relating to above-email.	
1345	Hannah Tomlinson	David Daleiden	Phill Kline		6/25/14 12:48 PM	Attorney-Client	Confidential email providing legal advice regarding investigative journalism methods.	
1346	David Daleiden	Hannah Tomlinson	Phill Kline		6/25/14 5:36 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods.	
1347	David Daleiden	Hannah Tomlinson			6/27/14 1:48 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods.	
1348	Hannah Tomlinson	David Daleiden			6/27/14 3:29 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding legality of fetal tissue procurement practices.	
1349	David Daleiden	Hannah Tomlinson			6/27/14 8:58 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1350	David Daleiden	Hannah Tomlinson, Phill Kline			7/2/14 1:05 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1351					7/2/14 1:05 PM	Attorney-Client	Word document relating to above-email.	
1352	David Daleiden	Hannah Tomlinson, Phill Kline			7/2/14 10:18 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of investigative journalism methods.	
1356	David Daleiden	Hannah Tomlinson	Phill Kline		7/8/14 10:21 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1357	David Daleiden	Hannah Tomlinson	Phill Kline		7/8/14 10:45 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding and the legality of fetal tissue procurement practices.	
1358	Hannah Tomlinson	David Daleiden	Phill Kline		7/9/14 1:06 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1359	David Daleiden	Hannah Tomlinson	Phill Kline		7/9/14 1:17 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1360	David Daleiden	Hannah Tomlinson	Phill Kline		7/9/14 1:22 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1366	David Daleiden	Hannah Tomlinson	Phill Kline, Claude Allen	Father Claude Williams	7/10/14 3:44 AM	Attorney-Client Privilege; Clergy-Communicant Privilege	Confidential email providing counsel with update on project to obtain legal advice.	
1367	Hannah Tomlinson	David Daleiden			7/10/14 2:18 PM	Attorney-Client	Confidential email responding to update provided by client on project to obtain legal advice.	
1368	David Daleiden	Phill Kline, Hannah Tomlinson			7/12/14 12:44 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1369	David Daleiden	Katie Short			7/14/14 5:13 AM	Attorney-Client	Confidential email providing legal communication with counsel reflecting legal planning	
1370					7/14/14 5:13 AM	Attorney-Client	PDF document relating to above-email.	
1371	Claude Allen	David Daleiden			7/14/14 11:35 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding investigative journalism methods	
1372	David Daleiden	Claude Allen			7/14/14 5:41 PM	Attorney-Client	Confidential email responding to update provided by client on project to obtain legal advice.	Produced in Redacted Form
1373	David Daleiden	Jim Holman			7/14/14 8:40 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel reflecting legal planning	
1374					7/14/14 8:40 PM	Attorney-Client	PDF document relating to above-email.	
1375	David Daleiden	Claude Allen	Ray Ruddy		7/14/14 8:58 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel reflecting investigative journalism methods and legal planning	
1376					7/14/14 8:58 PM	Attorney-Client Privilege; Common Interest Doctrine	PDF document relating to above-email.	
1377	David Daleiden	Phill Kline, Hannah Tomlinson			7/15/14 2:38 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1378					7/15/14 2:38 AM	Attorney-Client	Word document relating to above-email.	
1379					7/15/14 2:38 AM	Attorney-Client	Word document relating to above-email.	
1388	Hannah Tomlinson	Phill Kline, David Daleiden			7/15/14 4:27 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1389	Jim Holman	David Daleiden			7/15/14 4:50 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding pertinent information and legal planning	Some Redactions

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1390	David Daleiden	Phill Kline, Hannah Tomlinson			7/15/14 5:14 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1391	David Daleiden	Claude Allen			7/15/14 8:15 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	
1392	Claude Allen	David Daleiden			7/15/14 9:06 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	Some Redactions
1393	David Daleiden	Claude Allen			7/15/14 9:47 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	
1394	David Daleiden	Phill Kline, Hannah Tomlinson			7/15/14 9:48 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	Some Redactions
1395	David Daleiden	Phill Kline	Hannah Tomlinson		7/15/14 9:56 PM	Attorney-Client	Confidential email regarding legal advice of counsel regarding nonprofit corporations.	
1396					7/15/14 9:56 PM	Attorney-Client	PDF document relating to above-email.	
1397	David Daleiden	Claude Allen	Phill Kline, Hannah Tomlinson		7/16/14 7:39 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	Some Redactions
1398	Hannah Tomlinson	David Daleiden			7/16/14 7:52 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding strategy	
1400	David Daleiden	Phill Kline, Hannah Tomlinson			7/16/14 10:00 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
1402	Phill Kline	David Daleiden	Phill Kline, Hannah Tomlinson		7/17/14 12:38 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
1404	Hannah Tomlinson	Phill Kline	David Daleiden, Phill Kline		7/17/14 2:54 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
1406	David Daleiden	Theresa Deisher	Phill Kline, Hannah Tomlinson		7/17/14 6:37 PM	Attorney-Client	Confidential email regarding facilitating production attorney work product.	Some Redactions
1407	Theresa Deisher	David Daleiden	Phill Kline, Hannah Tomlinson		7/17/14 8:26 PM	Attorney-Client	Confidential email regarding facilitating production attorney work product.	Some Redactions
1408	Hannah Tomlinson	Theresa Deisher	David Daleiden, Phill Kline		7/17/14 9:28 PM	Attorney-Client	Confidential email regarding facilitating production attorney work product.	Some Redactions
1409	David Daleiden	Theresa Deisher	Phill Kline, Hannah Tomlinson		7/17/14 11:10 PM	Work Product	Confidential email regarding attorney work product.	
1410	David Daleiden	Theresa Deisher	Phill Kline, Hannah Tomlinson		7/18/14 12:05 AM	Work Product	Confidential email regarding attorney work product.	
1412	Phill Kline	David Daleiden, Hannah Tomlinson			7/18/14 10:09 PM	Attorney-Client	Confidential email requesting information from client for counsel to provide legal advice on the legality of fetal tissue procurement practices.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1413	David Daleiden	Phill Kline	Hannah Tomlinson		7/18/14 10:35 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1414	Hannah Tomlinson	David Daleiden			7/19/14 12:09 AM	Attorney-Client	Confidential email requesting information from client for counsel to provide legal advice on the legality of fetal tissue procurement practices.	
1415	David Daleiden	Phill Kline, Hannah Tomlinson			7/19/14 12:30 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1416	Hannah Tomlinson	David Daleiden	Phill Kline		7/19/14 12:36 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1417	David Daleiden	Phill Kline, Hannah Tomlinson			7/19/14 12:37 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1418					7/19/14 12:37 AM	Attorney-Client	Audio file relating to above-email.	
1419	Phill Kline	Hannah Tomlinson, David Daleiden	Phill Kline		7/19/14 1:26 AM	Attorney-Client	Confidential email requesting information from client for counsel to provide legal advice on the legality of fetal tissue procurement practices.	
1420	David Daleiden	Phill Kline	Hannah Tomlinson, Phill Kline		7/19/14 1:32 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1421					7/19/14 1:32 AM	Attorney-Client	PDF document relating to above-email.	
1422	David Daleiden	Phill Kline	Hannah Tomlinson, Phill Kline		7/19/14 1:34 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1423	David Daleiden	Phill Kline, Hannah Tomlinson			7/19/14 2:34 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1424	David Daleiden	Hannah Tomlinson, Phill Kline			7/19/14 4:08 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1425					7/19/14 4:08 AM	Attorney-Client	Video file relating to above-email.	
1426					7/19/14 4:08 AM	Attorney-Client	Video file relating to above-email.	
1427					7/19/14 4:08 AM	Attorney-Client	Video file relating to above-email.	
1428					7/19/14 4:08 AM	Attorney-Client	Video file relating to above-email.	
1429					7/19/14 4:08 AM	Attorney-Client	Video file relating to above-email.	
1430					7/19/14 4:08 AM	Attorney-Client	Video file relating to above-email.	
1431					7/19/14 4:08 AM	Attorney-Client	Video file relating to above-email.	
1432					7/19/14 4:08 AM	Attorney-Client	Video file relating to above-email.	
1433					7/19/14 4:08 AM	Attorney-Client	Video file relating to above-email.	
1434					7/19/14 4:08 AM	Attorney-Client	Video file relating to above-email.	
1435					7/19/14 4:08 AM	Attorney-Client	Video file relating to above-email.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1436	Phill Kline	David Daleiden, Hannah Tomlinson, Pk Phill Kline			7/19/14 8:08 AM	Attorney-Client	Confidential email providing legal advice regarding the legality of fetal tissue procurement practices.	
1437	David Daleiden	Phill Kline, Hannah Tomlinson			7/22/14 10:36 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1438					7/22/14 10:36 AM	Attorney-Client	Image file relating to above-email.	
1439	Hannah Tomlinson	David Daleiden	Phill Kline		7/22/14 5:16 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1440	David Daleiden	Hannah Tomlinson, Phill Kline			7/23/14 7:53 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1441	David Daleiden	Hannah Tomlinson, Phill Kline			7/23/14 1:00 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1442	Hannah Tomlinson	David Daleiden	Phill Kline		7/25/14 12:25 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding the legality of fetal tissue procurement practices.	
1443	Hannah Tomlinson	David Daleiden	Phill Kline		7/25/14 5:09 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding the legality of fetal tissue procurement practices.	
1444	David Daleiden	Phill Kline, Hannah Tomlinson			7/28/14 7:50 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1446	David Daleiden	Claude Allen, Ray Ruddy		Albin Rhomberg, Jim Holman	7/28/14 8:46 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email containing client information for counsel to provide legal advice regarding fetal tissue procurement practices.	
1447	Phill Kline	David Daleiden	Hannah Tomlinson		7/28/14 8:54 PM	Attorney-Client	Confidential email regarding legal advice about the legality of fetal tissue procurement practices.	
1448	Casey Mattox	David Daleiden			7/28/14 8:56 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices	
1449	David Daleiden	Casey Mattox			7/28/14 8:56 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding overall project goals.	
1450	Albin Rhomberg	David Daleiden			7/28/14 10:36 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding legality of fetal tissue procurement practices.	
1451	David Daleiden	Katie Short			7/29/14 5:04 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods.	
1452	Katie Short	David Daleiden			7/29/14 7:13 PM	Attorney-Client	Confidential email requesting information from client for counsel to provide legal advice regarding investigative journalism methods.	
1453	David Daleiden	Katie Short			7/29/14 11:37 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods.	
1454	David Daleiden	Hannah Tomlinson, Phill Kline			7/31/14 6:05 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1455	Hannah Tomlinson	David Daleiden	Phill Kline		7/31/14 6:36 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1456	Katie Short	David Daleiden			8/1/14 1:08 AM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods.	
1457	David Daleiden	Katie Short			8/1/14 3:03 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods.	
1458	Katie Short	David Daleiden			8/1/14 3:18 AM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods.	
1459	David Daleiden	Katie Short			8/1/14 3:24 AM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods.	
1460	Katie Short	David Daleiden			8/1/14 3:32 AM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods.	
1461	David Daleiden	Phill Kline, Hannah Tomlinson	Claude Allen, Ray Ruddy		8/1/14 6:24 AM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices	
1462	David Daleiden	Hannah Tomlinson, Phill Kline			8/1/14 2:59 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1464	David Daleiden	Hannah Tomlinson, Phill Kline			8/1/14 6:22 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1465	David Daleiden	Albin Rhomberg, Jim Holman	Katie Short		8/4/14 3:00 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices and abortion reimbursements.	
1467	David Daleiden	Hannah Tomlinson, Phill Kline			8/4/14 9:08 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1468	Hannah Tomlinson	David Daleiden	Phill Kline		8/4/14 9:43 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1469	David Daleiden	Hannah Tomlinson	Phill Kline		8/5/14 1:20 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1470	Hannah Tomlinson	David Daleiden	Phill Kline		8/5/14 1:55 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1471	Hannah Tomlinson	David Daleiden	Phill Kline		8/6/14 7:13 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding the legality of fetal tissue procurement practices.	
1472					8/6/14 7:13 PM	Attorney-Client	Powerpoint file relating to above-email.	
1473	Phill Kline	Hannah Tomlinson, David Daleiden	Phill Kline		8/6/14 7:18 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding the legality of fetal tissue procurement practices.	
1474	David Daleiden	Phill Kline	Hannah Tomlinson, Phill Kline		8/6/14 7:40 PM	Attorney-Client	Confidential email containing legal advice of counsel regarding the legality of fetal tissue procurement practices.	
1475	Hannah Tomlinson	Phill Kline	David Daleiden, Phill Kline		8/6/14 7:49 PM	Attorney-Client	Confidential email containing legal advice of counsel regarding the legality of fetal tissue procurement practices.	
1476	Hannah Tomlinson	David Daleiden	Phill Kline		8/6/14 7:50 PM	Attorney-Client	Confidential email containing legal advice of counsel regarding the legality of fetal tissue procurement practices.	
1477	Phill Kline	Hannah Tomlinson, David Daleiden	Pk Phill Kline		8/6/14 9:33 PM	Attorney-Client	Confidential email containing legal advice of counsel regarding the legality of fetal tissue procurement practices.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1478	Phill Kline	Hannah Tomlinson, David Daleiden			8/7/14 12:47 PM	Attorney-Client; Work Product	Confidential email providing legal advice of counsel and reflecting attorney work product regarding the legality of fetal tissue procurement practices.	
1479	Hannah Tomlinson	David Daleiden			8/7/14 1:04 PM	Attorney-Client	Confidential email requesting information from client for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1480	Hannah Tomlinson	David Daleiden			8/7/14 3:04 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1481	Hannah Tomlinson	Phill Kline, David Daleiden			8/7/14 6:34 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding the legality of fetal tissue procurement practices.	
1483	David Daleiden	Phill Kline	Hannah Tomlinson		8/7/14 7:51 PM	Attorney-Client	Confidential email containing feedback from client regarding legal advice of counsel's memorandum about legality of fetal tissue procurement practices.	
1484	Phill Kline	David Daleiden	Hannah Tomlinson		8/8/14 12:28 AM	Attorney-Client	Confidential email providing legal advice of counsel regarding production of memorandum about legality of fetal tissue procurement practices.	
1485	David Daleiden	Phill Kline	Hannah Tomlinson		8/8/14 12:41 AM	Attorney-Client	Confidential email containing feedback from client regarding legal advice of counsel about legality of fetal tissue procurement practices.	
1486	Phill Kline	David Daleiden			8/8/14 2:15 AM	Attorney-Client	Confidential email containing feedback from client regarding legal advice of counsel about legality of fetal tissue procurement practices.	
1487	Hannah Tomlinson	David Daleiden			8/9/14 4:55 AM	Attorney-Client	Confidential email requesting information from client for counsel to provide legal advice on the legality of fetal tissue procurement practices.	
1488	Hannah Tomlinson	Phill Kline, David Daleiden			8/9/14 6:21 AM	Attorney-Client	Confidential email providing legal advice of counsel regarding the legality of fetal tissue procurement practices and requesting information from client and co-counsel.	
1489					8/9/14 6:21 AM	Attorney-Client	Powerpoint file relating to above-email.	
1490	Casey Mattox	David Daleiden			8/11/14 3:13 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding overall project goals.	
1491	David Daleiden	Hannah Tomlinson			8/11/14 8:49 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice on the legality of fetal tissue procurement practices.	
1492	David Daleiden	Phill Kline	Hannah Tomlinson		8/11/14 8:49 PM	Attorney-Client	Confidential email requesting information from client for counsel to provide legal advice on the legality of fetal tissue procurement practices.	
1493	David Daleiden	Phill Kline, Hannah Tomlinson			8/11/14 8:51 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1494	David Daleiden	Hannah Tomlinson			8/11/14 8:56 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1496	Phill Kline	David Daleiden, Phill Kline, Hannah Tomlinson			8/11/14 9:00 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding production of memorandum about the legality of fetal tissue procurement practices.	
1497	Hannah Tomlinson	David Daleiden			8/11/14 10:51 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding production of memorandum about the legality of fetal tissue procurement practices.	
1498	David Daleiden	Claude Allen			8/12/14 6:59 PM	Attorney-Client	Confidential email providing update on project for purpose of obtaining legal advice.	
1499	David Daleiden	Casey Mattox			8/12/14 11:27 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1500	David Daleiden	Hannah Tomlinson	Phill Kline		8/13/14 1:27 AM	Attorney-Client	Confidential email requesting legal advice of counsel on the production of memorandum regarding the legality of fetal tissue procurement practices.	
1501					8/13/14 1:27 AM	Attorney-Client	Video file relating to above-email.	
1502	Hannah Tomlinson	David Daleiden	Phill Kline		8/14/14 1:18 AM	Attorney-Client	Confidential email providing legal advice of counsel regarding production of memorandum about the legality of fetal tissue procurement practices.	
1503	David Daleiden	Hannah Tomlinson	Phill Kline		8/14/14 6:17 PM	Attorney-Client	Confidential email regarding legal memorandum about the legality of fetal tissue procurement practices.	
1504	Hannah Tomlinson	David Daleiden	Phill Kline		8/14/14 6:20 PM	Attorney-Client	Confidential email regarding legal memorandum about the legality of fetal tissue procurement practices.	
1505	David Daleiden	Hannah Tomlinson	Phill Kline		8/14/14 6:26 PM	Attorney-Client	Confidential email regarding legal memorandum about the legality of fetal tissue procurement practices.	
1506	Hannah Tomlinson	David Daleiden	Phill Kline		8/14/14 9:37 PM	Attorney-Client	Confidential email regarding legal memorandum about the legality of fetal tissue procurement practices.	
1507	David Daleiden	Hannah Tomlinson	Phill Kline		8/15/14 12:50 AM	Attorney-Client	Confidential email regarding legal memorandum about the legality of fetal tissue procurement practices.	
1508	Hannah Tomlinson	David Daleiden	Phill Kline		8/15/14 1:49 PM	Attorney-Client	Confidential email regarding legal memorandum about the legality of fetal tissue procurement practices.	
1509	Hannah Tomlinson	David Daleiden			8/15/14 6:45 PM	Attorney-Client	Confidential email providing legal advice and a legal memorandum regarding the legality of fetal tissue procurement practices.	
1510					8/15/14 6:45 PM	Attorney-Client	Powerpoint file relating to above-email.	
1511	David Daleiden	Hannah Tomlinson			8/15/14 6:46 PM	Attorney-Client	Confidential email providing client information for counsel to provide legal advice regarding a legal memorandum about the legality of fetal tissue procurement practices.	
1512	David Daleiden	Hannah Tomlinson, Phill Kline			8/15/14 7:42 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding production of a memorandum about the legality of fetal tissue procurement practices.	
1513	Hannah Tomlinson	David Daleiden	Phill Kline		8/15/14 9:20 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding production of memorandum about the legality of fetal tissue procurement practices.	
1514	David Daleiden	Hannah Tomlinson			8/16/14 12:43 AM	Attorney-Client	Confidential email providing legal advice of counsel regarding production of memorandum about the legality of fetal tissue procurement practices.	
1515					8/16/14 12:43 AM	Attorney-Client	Powerpoint file relating to above-email.	
1516	David Daleiden	Hannah Tomlinson, Phill Kline			8/16/14 12:46 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1532					8/16/14 12:46 AM	Attorney-Client	Audio file relating to above-email.	
1533					8/16/14 12:46 AM	Attorney-Client	Audio file relating to above-email.	
1534					8/16/14 12:46 AM	Attorney-Client	Audio file relating to above-email.	
1535					8/16/14 12:46 AM	Attorney-Client	Audio file relating to above-email.	
1536					8/16/14 12:46 AM	Attorney-Client	Audio file relating to above-email.	
1537					8/16/14 12:46 AM	Attorney-Client	Audio file relating to above-email.	
1538					8/16/14 12:46 AM	Attorney-Client	Audio file relating to above-email.	
1539					8/16/14 12:46 AM	Attorney-Client	Audio file relating to above-email.	
1540					8/16/14 12:46 AM	Attorney-Client	Audio file relating to above-email.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1541					8/16/14 12:46 AM	Attorney-Client	Video file relating to above-email.	
1542					8/16/14 12:46 AM	Attorney-Client	Audio file relating to above-email.	
1543					8/16/14 12:46 AM	Attorney-Client	Powerpoint file relating to above-email.	
1547	David Daleiden	Hannah Tomlinson, Phill Kline			8/18/14 4:41 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding production of a memorandum about the legality of fetal tissue procurement practices.	
1548	Hannah Tomlinson	David Daleiden	Phill Kline		8/18/14 12:12 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding production of memorandum about the legality of fetal tissue procurement practices.	
1550	Hannah Tomlinson	David Daleiden	Phill Kline		8/19/14 1:42 AM	Attorney-Client	Confidential email providing legal advice of counsel regarding production of memorandum about the legality of fetal tissue procurement practices.	
1551	Hannah Tomlinson	David Daleiden	Phill Kline		8/19/14 3:44 AM	Attorney-Client	Confidential email providing legal advice of counsel regarding production of memorandum about the legality of fetal tissue procurement practices.	
1552					8/19/14 3:44 AM	Attorney-Client	Powerpoint file relating to above-email.	
1553	Hannah Tomlinson	David Daleiden, Phill Kline			8/19/14 3:48 AM	Attorney-Client	Confidential email providing legal advice of counsel regarding production of memorandum about the legality of fetal tissue procurement practices.	
1554	David Daleiden	Hannah Tomlinson	Phill Kline		8/21/14 2:17 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding the legality of fetal tissue procurement practices.	
1555	Hannah Tomlinson	David Daleiden	Phill Kline		8/21/14 2:46 AM	Attorney-Client	Confidential email requesting information from client for counsel to provide legal advice on the legality of fetal tissue procurement practices.	
1556	David Daleiden	Hannah Tomlinson	Phill Kline		8/26/14 12:01 AM	Attorney-Client	Confidential email providing client information for counsel to provide legal advice regarding a legal memorandum about the legality of fetal tissue procurement practices.	
1557	Hannah Tomlinson	David Daleiden	Phill Kline		8/26/14 12:55 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
1560	Hannah Tomlinson	David Daleiden			8/29/14 9:55 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
1561	Hannah Tomlinson	David Daleiden			9/5/14 9:44 PM	Attorney-Client	Confidential email requesting information from client for counsel to provide legal advice on the legality of fetal tissue procurement practices.	
1562	Hannah Tomlinson	David Daleiden			9/5/14 10:21 PM	Attorney-Client	Confidential email requesting information from client for counsel to provide legal advice on the legality of fetal tissue procurement practices.	
1563	David Daleiden	Hannah Tomlinson			9/5/14 11:12 PM	Attorney-Client	Confidential email providing client information for counsel to provide legal advice regarding a legal memorandum about the legality of fetal tissue procurement practices.	
1564	Hannah Tomlinson	David Daleiden			9/5/14 11:20 PM	Attorney-Client	Confidential email providing legal advice of counsel about the legality of fetal tissue procurement practices.	
1565					9/5/14 11:20 PM	Attorney-Client	Powerpoint file relating to above-email.	
1566	David Daleiden	Hannah Tomlinson			9/5/14 11:37 PM	Attorney-Client	Confidential email providing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1567					9/5/14 11:37 PM	Attorney-Client	Audio file relating to above-email.	
1569	Hannah Tomlinson	David Daleiden			9/6/14 12:08 AM	Attorney-Client	Confidential email requesting information from client for counsel to provide legal advice on the legality of fetal tissue procurement practices.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1570	Hannah Tomlinson	Phill Kline	David Daleiden		9/6/14 12:34 AM	Attorney-Client	Confidential email providing legal memorandum and advice of counsel regarding the legality of fetal tissue procurement practices.	
1571					9/6/14 12:34 AM	Attorney-Client	Powerpoint file relating to above-email.	
1572	David Daleiden	Claude Allen	Ray Ruddy		9/9/14 4:43 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing update on project for purpose of obtaining legal advice.	
1573	Ray Ruddy	David Daleiden, Claude Allen			9/10/14 3:56 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices	
1574	David Daleiden	Phill Kline, Hannah Tomlinson			9/10/14 9:10 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1575	David Daleiden	Ray Ruddy	Claude Allen		9/10/14 10:01 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices	
1576	David Daleiden	Phill Kline	Hannah Tomlinson		9/10/14 10:16 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices	
1577	David Daleiden	Phill Kline, Hannah Tomlinson			9/10/14 10:16 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1578	David Daleiden	Phill Kline, Hannah Tomlinson			9/10/14 10:22 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1579	Hannah Tomlinson	David Daleiden	Phill Kline		9/10/14 11:09 PM	Attorney-Client	Confidential email reflecting legal advice about client video on the legality of fetal tissue procurement practices.	
1580	Hannah Tomlinson	David Daleiden			9/10/14 11:19 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
1581	David Daleiden	Hannah Tomlinson			9/10/14 11:31 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
1582	Phill Kline	David Daleiden, Pk Phill Kline, Hannah Tomlinson			9/11/14 12:40 AM	Attorney-Client	Confidential email providing legal advice of counsel regarding the legality of fetal tissue procurement practices.	
1583	Ray Ruddy	David Daleiden	Ray Ruddy		9/11/14 12:42 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices	
1584	David Daleiden	Ray Ruddy			9/11/14 3:44 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices	Some Redactions
1585	David Daleiden	Claude Allen	Ray Ruddy		9/11/14 3:51 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding nonprofit corporations	
1586	David Daleiden	Phill Kline	Pk Phill Kline, Hannah Tomlinson		9/11/14 3:58 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding the legality of fetal tissue procurement practices.	
1587	David Daleiden	Ray Ruddy	Ray Ruddy, Claude Allen		9/11/14 4:04 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices	
1588	David Daleiden	Phill Kline, Hannah Tomlinson			9/11/14 4:05 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1589	Phill Kline	David Daleiden	Pk Phill Kline, Hannah Tomlinson		9/11/14 4:30 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1593	David Daleiden	Claude Allen			9/12/14 9:53 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices and investigative journalism methods	
1600	David Daleiden	Hannah Tomlinson, Phill Kline			9/19/14 4:01 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices.	
1601					9/19/14 4:01 AM	Attorney-Client	Word document relating to above-email.	
1603	David Daleiden	Hannah Tomlinson	Phill Kline		9/19/14 4:03 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices.	
1604	Phill Kline	David Daleiden			9/19/14 9:03 AM	Attorney-Client	Confidential email providing legal advice of counsel regarding legality of fetal tissue procurement practices.	
1605	Phill Kline	David Daleiden	Hannah Tomlinson		9/19/14 9:06 AM	Attorney-Client	Confidential email providing legal advice of counsel regarding legality of fetal tissue procurement practices.	
1610	David Daleiden	Claude Allen, Phill Kline, Hannah Tomlinson			9/19/14 7:19 PM	Attorney-Client	Confidential email reflecting legal communication with counsel regarding pertinent facts or information	
1611					9/19/14 7:19 PM	Attorney-Client	Word document relating to above-email.	
1612	David Daleiden	Phill Kline, Hannah Tomlinson			9/27/14 1:06 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1613	David Daleiden	Claude Allen			9/29/14 4:50 PM	Attorney-Client	Confidential email providing update on project to counsel for purpose of obtaining legal advice.	
1614	Claude Allen	David Daleiden			10/1/14 12:45 PM	Attorney-Client	Confidential email responding to provision of update on project to counsel for purpose of obtaining legal advice.	Some Redactions
1615	David Daleiden	Claude Allen			10/1/14 8:09 PM	Attorney-Client	Confidential email responding to provision of update on project to counsel for purpose of obtaining legal advice.	Some Redactions
1620	Phill Kline	Claude Allen,David Daleiden	Hannah Tomlinson		10/3/14 7:31 PM	Attorney-Client;Work Product	Confidential email reflecting legal communication with counsel regarding legal strategy	
1622	David Daleiden	Claude Allen			10/9/14 2:50 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding nonprofit corporations and arrangements	Some Redactions
1625	David Daleiden	Hannah Tomlinson	Phill Kline		10/10/14 10:39 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1626	Hannah Tomlinson	David Daleiden	Phill Kline		10/10/14 10:50 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
1627	Phill Kline	David Daleiden			10/14/14 4:57 PM	Attorney-Client	Confidential email requesting information from client for counsel to provide legal advice on the legality of fetal tissue procurement practices.	
1628	David Daleiden	Phill Kline	Hannah Tomlinson		10/14/14 6:42 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1629	Phill Kline	David Daleiden			10/14/14 6:46 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1630	Hannah Tomlinson	David Daleiden	Phill Kline		10/14/14 8:15 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1631	David Daleiden	Hannah Tomlinson	Phill Kline		10/14/14 11:07 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1632	Hannah Tomlinson	David Daleiden, Phill Kline			10/15/14 6:11 AM	Attorney-Client	Confidential email reflecting legal advice of counsel regarding investigative journalism methods.	
1633	David Daleiden	Phill Kline, Hannah Tomlinson			10/16/14 10:46 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
1635	David Daleiden	Hannah Tomlinson, Phill Kline			10/16/14 10:48 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods.	
1636	David Daleiden	Phill Kline, Hannah Tomlinson			10/17/14 4:52 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
1640	David Daleiden	Ray Ruddy, Claude Allen			10/17/14 7:12 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email reflecting legal communication with counsel regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
1643	Hannah Tomlinson	David Daleiden			10/17/14 8:24 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
1644	David Daleiden	Hannah Tomlinson, Phill Kline			10/17/14 10:03 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
1645	David Daleiden	Hannah Tomlinson	Phill Kline		10/20/14 7:13 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
1647	Hannah Tomlinson	David Daleiden			10/21/14 4:49 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
1650	David Daleiden	Phill Kline, Hannah Tomlinson			10/21/14 9:08 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
1651	David Daleiden	Phill Kline, Hannah Tomlinson			10/24/14 5:15 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
1652	David Daleiden	Phill Kline, Hannah Tomlinson			10/24/14 5:22 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
1653	David Daleiden	Phill Kline, Hannah Tomlinson			10/24/14 5:26 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
1654	David Daleiden	Hannah Tomlinson	Phill Kline		10/24/14 5:35 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
1655	Hannah Tomlinson	David Daleiden			10/24/14 5:29 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
1656	David Daleiden	Hannah Tomlinson			10/24/14 6:28 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
1657	Hannah Tomlinson	David Daleiden			10/24/14 6:35 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
1658	David Daleiden	Hannah Tomlinson, Phill Kline			10/25/14 3:55 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
1659					10/25/14 3:55 AM	Attorney-Client	Audio file relating to above-email.	
1660					10/25/14 3:55 AM	Attorney-Client	Audio file relating to above-email.	
1661					10/25/14 3:55 AM	Attorney-Client	Audio file relating to above-email.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1662					10/25/14 3:55 AM	Attorney-Client	Audio file relating to above-email.	
1663					10/25/14 3:55 AM	Attorney-Client	Audio file relating to above-email.	
1664					10/25/14 3:55 AM	Attorney-Client	Audio file relating to above-email.	
1666	David Daleiden	Hannah Tomlinson			10/27/14 4:50 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
1667	Hannah Tomlinson	David Daleiden			10/27/14 4:52 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
1668	David Daleiden	Hannah Tomlinson	Phill Kline		10/27/14 4:53 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
1670	David Daleiden	Ray Ruddy, Claude Allen			10/28/14 7:40 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices	
1671	David Daleiden	Phill Kline, Hannah Tomlinson			11/6/14 12:54 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
1672	Hannah Tomlinson	David Daleiden	Phill Kline		11/6/14 1:50 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
1673	David Daleiden	Phill Kline, Hannah Tomlinson			11/7/14 11:17 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
1674	David Daleiden	Phill Kline, Hannah Tomlinson			11/7/14 11:21 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
1675	David Daleiden	Phill Kline, Hannah Tomlinson			11/8/14 12:29 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
1676	David Daleiden	Phill Kline, Hannah Tomlinson			11/8/14 3:30 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
1677	Hannah Tomlinson	David Daleiden			11/12/14 10:15 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
1678	David Daleiden	Hannah Tomlinson, Phill Kline			11/14/14 7:59 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
1679	David Daleiden	Hannah Tomlinson			11/14/14 8:00 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
1687	David Daleiden	Claude Allen			11/21/14 7:40 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
1688	David Daleiden	Hannah Tomlinson	Phill Kline		11/26/14 3:49 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
1689	Hannah Tomlinson	David Daleiden			11/26/14 5:11 AM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1690	Hannah Tomlinson	David Daleiden			11/26/14 4:42 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
1691	David Daleiden	Hannah Tomlinson			11/30/14 11:34 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
1693	David Daleiden	Phill Kline, Hannah Tomlinson			12/7/14 12:55 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
1694	Hannah Tomlinson	David Daleiden	Phill Kline		12/8/14 12:56 AM	Attorney-Client	Confidential email requesting information from client for counsel to provide legal advice regarding investigative journalism methods.	
1695	David Daleiden	Hannah Tomlinson	Phill Kline		12/8/14 1:10 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods and contract formation.	
1696	Phill Kline	David Daleiden, Hannah Tomlinson			12/8/14 1:17 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding contract clauses.	
1697	David Daleiden	Phill Kline	Hannah Tomlinson		12/8/14 1:22 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding contract formation.	
1698	David Daleiden	Phill Kline	Hannah Tomlinson		12/8/14 5:10 PM	Attorney-Client	Confidential email containing client information and requesting legal advice of counsel regarding contract formation.	
1700	David Daleiden	Claude Allen			12/11/14 8:15 PM	Attorney-Client	Confidential email reflecting legal communication with counsel regarding arrangements	
1701	David Daleiden	Hannah Tomlinson	Phill Kline		12/12/14 12:05 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
1702	Claude Allen	David Daleiden			12/12/14 2:06 PM	Attorney-Client	Confidential email reflecting legal communication with counsel regarding arrangements	Some Redactions
1703	David Daleiden	Claude Allen			12/12/14 5:01 PM	Attorney-Client	Confidential email reflecting legal communication with counsel regarding arrangements	Some Redactions
1704	David Daleiden	Claude Allen			12/12/14 9:34 PM	Attorney-Client	Confidential email reflecting legal communication with counsel regarding arrangements	Some Redactions
1705	David Daleiden	Hannah Tomlinson, Phill Kline	Claude Allen		12/13/14 1:26 AM	Attorney-Client	Confidential email providing information to counsel for purpose of determining whether it affects legal advice provided.	
1706	Hannah Tomlinson	David Daleiden	Phill Kline, Claude Allen		12/13/14 1:30 AM	Attorney-Client	Confidential email responding to provision of information to counsel for purpose of determining whether it affects legal advice provided.	
1707	David Daleiden	Phill Kline, Hannah Tomlinson	Claude Allen		12/15/14 5:44 PM	Attorney-Client	Confidential email providing information and update to counsel for purpose of obtaining legal advice.	
1708	David Daleiden	Claude Allen	Ray Ruddy		12/15/14 10:25 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding pertinent facts or information	
1709					12/15/14 10:25 PM	Attorney-Client	PDF document relating to above-email.	
1712	Hannah Tomlinson	David Daleiden	Claude Allen, Phill Kline		12/17/14 10:11 PM	Attorney-Client	Confidential email providing legal communication with counsel reflecting investigative journalism methods	
1716	David Daleiden	Claude Allen	Ray Ruddy		12/19/14 7:35 AM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding nonprofit corporations and regarding arrangements	
1717					12/19/14 7:35 AM	Attorney-Client Privilege; Common Interest Doctrine	PDF document relating to above-email.	
1721	Hannah Tomlinson	David Daleiden, Phill Kline, Claude Allen			12/20/14 7:28 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding legal strategy or planning	
1722	David Daleiden	Claude Allen			12/22/14 4:26 PM	Attorney-Client	Confidential email reflecting legal communication with counsel regarding planning and arrangements	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1723	Claude Allen	David Daleiden			12/23/14 3:41 PM	Attorney-Client	Confidential email reflecting legal communication with counsel regarding arrangements	Some Redactions
1724	David Daleiden	Claude Allen			12/23/14 6:30 PM	Attorney-Client	Confidential email reflecting legal communication with counsel regarding arrangements	Some Redactions
1725	David Daleiden	Claude Allen	Ray Ruddy		12/23/14 8:59 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding nonprofit corporations	
1726					12/23/14 8:59 PM	Attorney-Client Privilege; Common Interest Doctrine	PDF document relating to above-email.	
1728	David Daleiden	Casey Mattox			12/29/14 11:53 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices.	
1729	David Daleiden	Phill Kline, Hannah Tomlinson			12/29/14 11:59 PM	Attorney-Client	Confidential email requesting legal advice and containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
1730	Casey Mattox	David Daleiden			12/30/14 4:13 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices	
1735	Casey Mattox	David Daleiden			12/31/14 1:37 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices	
1736	David Daleiden	Claude Allen, Ray Ruddy			1/2/15 6:25 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding arrangements	
1737	David Daleiden	Phill Kline, Hannah Tomlinson, Claude Allen			1/2/15 11:08 PM	Attorney-Client	Confidential email reflecting legal communication with counsel regarding pertinent facts or information	
1738	Hannah Tomlinson	David Daleiden	Phill Kline		1/3/15 2:46 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
1743	David Daleiden	Hannah Tomlinson	Phill Kline		1/5/15 10:10 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
1744	Hannah Tomlinson	David Daleiden			1/5/15 10:44 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
1748	Phill Kline	David Daleiden			1/6/15 3:51 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	Some Redactions
1749	David Daleiden	Phill Kline			1/6/15 4:54 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	Some Redactions
1750	David Daleiden	Phill Kline, Hannah Tomlinson, Claude Allen			1/6/15 5:26 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information	
1751	Hannah Tomlinson	David Daleiden	Phill Kline, Claude Allen		1/6/15 10:04 PM	Attorney-Client	Confidential email reflecting legal communication with counsel regarding legality of fetal tissue procurement	
1753	David Daleiden	Troy Newman, Ovide Lamontagne			1/7/15 7:27 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy, arrangements	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1754	Troy Newman	David Daleiden	Ovide Lamontagne		1/7/15 7:28 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy, arrangements	
1755	David Daleiden	Phill Kline	Hannah Tomlinson, Claude Allen		1/7/15 7:34 PM	Attorney-Client	Confidential email requesting legal communication with counsel regarding legal strategy and planning	
1756	Phill Kline	David Daleiden			1/7/15 7:48 PM	Attorney-Client	Confidential email requesting legal communication with counsel regarding legal strategy and planning	Some Redactions
1757	David Daleiden	Phill Kline			1/7/15 7:52 PM	Attorney-Client	Confidential email requesting legal communication with counsel regarding strategy and planning	Some Redactions
1758	David Daleiden	Phill Kline, Hannah Tomlinson, Claude Allen			1/7/15 8:13 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts	
1760	Phill Kline	David Daleiden			1/8/15 5:21 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	Some Redactions
1762	Claude Allen	David Daleiden			1/8/15 5:48 PM	Attorney-Client	Confidential email requesting legal communication with counsel regarding planning	Some Redactions
1769	David Daleiden	Phill Kline	Hannah Tomlinson, Phill Kline, Claude Allen		1/8/15 7:37 PM	Attorney-Client	Confidential email reflecting legal communication with counsel regarding arrangements	
1770	David Daleiden	Troy Newman			1/8/15 7:38 PM	Attorney-Client	Confidential email reflecting legal communication with counsel regarding arrangements	
1776	David Daleiden	Charmaine Yoest, Ovide Lamontagne	Troy Newman, Albin Rhomberg		1/12/15 7:52 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding formation of nonprofit corporation.	
1777	David Daleiden	Charmaine Yoest, Ovide Lamontagne	Albin Rhomberg, Troy Newman		1/12/15 8:17 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding formation of nonprofit corporation/collaboration/partnership.	
1778	David Daleiden	Claude Allen			1/12/15 8:28 PM	Attorney-Client	Confidential email providing legal communication with counsel reflecting legal strategy	
1779	David Daleiden	Charmaine Yoest, Ovide Lamontagne, Troy Newman, Albin Rhomberg			1/13/15 2:13 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement and abortion practices.	
1780	Troy Newman	David Daleiden	Charmaine Yoest, Ovide Lamontagne, Albin Rhomberg		1/13/15 6:15 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding abortion procedures.	
1781	Troy Newman	David Daleiden, Ovide Lamontagne, Charmaine Yoest			1/13/15 8:45 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information	
1782	David Daleiden	Troy Newman	Ovide Lamontagne, Charmaine Yoest		1/13/15 8:54 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices	
1783	David Daleiden	Phill Kline, Hannah Tomlinson			1/14/15 12:56 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
1784	David Daleiden	Ovide Lamontagne	Charmaine Yoest, Troy Newman		1/14/15 3:09 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1785	David Daleiden	Phill Kline, Hannah Tomlinson			1/14/15 3:11 AM	Attorney-Client	Confidential email requesting legal advice and containing client information for counsel to provide legal advice regarding formation of contract	
1788	Ovide Lamontagne	David Daleiden, Charmaine Yoest, Troy Newman, Albin Rhomberg	Anna Paprocki		1/14/15 12:45 PM	Attorney-Client	Confidential email reflecting legal advice and information of counsel for client to consider to enter into a client-attorney relationship.	
1790	Ovide Lamontagne	David Daleiden	Charmaine Yoest, Troy Newman		1/14/15 12:46 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy and legal arrangements	
1791	Charmaine Yoest	David Daleiden			1/14/15 3:13 PM	Attorney-Client	Confidential email regarding seeking legal advice regarding client legal representation.	
1792	David Daleiden	Ovide Lamontagne	Charmaine Yoest, Troy Newman		1/14/15 5:12 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
1795	David Daleiden	Charmaine Yoest	Ovide Lamontagne, Claude Allen		1/14/15 6:23 PM	Attorney-Client	Confidential email regarding seeking legal advice regarding legal representation.	
1796	Ovide Lamontagne	David Daleiden			1/14/15 6:26 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
1797	David Daleiden	Ovide Lamontagne			1/14/15 6:28 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
1798	Troy Newman	David Daleiden	Ovide Lamontagne, Charmaine Yoest		1/14/15 8:37 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding planning	
1799	Hannah Tomlinson	David Daleiden			1/14/15 11:09 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
1803	David Daleiden	Ovide Lamontagne			1/16/15 7:46 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	Some Redactions
1804	Ovide Lamontagne	David Daleiden			1/16/15 8:40 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	Some Redactions
1805	Ovide Lamontagne	David Daleiden	Peggy Crockett		1/16/15 8:56 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	Some Redactions
1806	Peggy Crockett	David Daleiden			1/16/15 9:37 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	Some Redactions
1807	David Daleiden	Peggy Crockett	Ovide Lamontagne		1/16/15 9:44 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	Some Redactions
1808	Hannah Tomlinson	David Daleiden			1/16/15 10:03 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism contracts.	
1809	Peggy Crockett	David Daleiden	Ovide Lamontagne, Peggy Crockett		1/16/15 11:11 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	Some Redactions
1810	David Daleiden	Peggy Crockett	Ovide Lamontagne, Peggy Crockett		1/17/15 12:12 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	Some Redactions
1811	David Daleiden	Ray Ruddy, Claude Allen			1/17/15 8:48 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding arrangements	Some Redactions
1812	David Daleiden	Hannah Tomlinson			1/17/15 8:58 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
1813	David Daleiden	Phill Kline	Hannah Tomlinson		1/17/15 9:20 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
1814	Phill Kline	David Daleiden			1/18/15 12:32 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	Some Redactions
1817	Phill Kline	David Daleiden			1/19/15 3:02 PM	Attorney-Client	Confidential email requesting legal communication with counsel regarding planning	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1818	Phill Kline	David Daleiden			1/19/15 3:02 PM	Attorney-Client	Confidential email requesting legal communication with counsel regarding planning	Some Redactions
1819	Phill Kline	David Daleiden			1/19/15 3:48 PM	Attorney-Client	Confidential email requesting legal communication with counsel regarding planning	Some Redactions
1820	David Daleiden	Phill Kline			1/19/15 5:29 PM	Attorney-Client	Confidential email requesting legal communication with counsel regarding planning	Some Redactions
1821	David Daleiden	Phill Kline			1/19/15 5:31 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	Some Redactions
1822	Phill Kline	David Daleiden			1/19/15 5:44 PM	Attorney-Client	Confidential email requesting legal communication with counsel regarding planning	Some Redactions
1823	David Daleiden	Phill Kline			1/19/15 5:45 PM	Attorney-Client	Confidential email requesting legal communication with counsel regarding planning	
1824	Phill Kline	David Daleiden	Hannah Tomlinson		1/19/15 6:03 PM	Attorney-Client	Confidential email requesting legal communication with counsel regarding planning	
1825	Phill Kline	David Daleiden			1/19/15 6:04 PM	Attorney-Client	Confidential email requesting legal communication with counsel regarding planning	
1826	David Daleiden	Phill Kline			1/19/15 6:11 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
1829	David Daleiden	Phill Kline			1/19/15 6:11 PM	Attorney-Client	Confidential email requesting legal communication with counsel regarding planning	
1830	Phill Kline	David Daleiden			1/19/15 6:30 PM	Attorney-Client	Confidential email requesting legal communication with counsel regarding planning	
1831	Phill Kline	David Daleiden			1/19/15 6:44 PM	Attorney-Client	Confidential email requesting legal communication with counsel regarding planning	
1832	David Daleiden	Ovide Lamontagne			1/19/15 9:17 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding nonprofit corporations	
1838	David Daleiden	Ovide Lamontagne, Troy Newman			1/20/15 9:32 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	
1839					1/20/15 9:32 PM	Attorney-Client	PDF document relating to above-email.	
1840	Charmaine Yoest	Ovide Lamontagne, David Daleiden			1/23/15 2:42 AM	Attorney-Client	Confidential email with counsel regarding fetal tissue procurement practices	
1841	David Daleiden	Charmaine Yoest	Ovide Lamontagne		1/23/15 3:55 AM	Attorney-Client	Confidential email with counsel regarding fetal tissue procurement practices	
1842	David Daleiden	Charmaine Yoest	Ovide Lamontagne		1/23/15 4:30 AM	Attorney-Client	Confidential email with counsel regarding fetal tissue procurement practices	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1843	David Daleiden	Charmaine Yoest	Ovide Lamontagne		1/23/15 5:56 AM	Attorney-Client	Confidential email with counsel regarding fetal tissue procurement practices	
1844	Ovide Lamontagne	David Daleiden	Eileen O'Connor, Charmaine Yoest		1/23/15 12:58 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy, arrangements	
1847	Ovide Lamontagne	David Daleiden			1/26/15 4:15 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent information or facts	
1848	David Daleiden	Ovide Lamontagne			1/26/15 5:17 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information	
1849					1/26/15 5:17 PM	Attorney-Client	PDF document relating to above-email.	
1850	David Daleiden	Ovide Lamontagne			1/28/15 8:06 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding nonprofit corporations and legal strategy	
1851					1/28/15 8:06 PM	Attorney-Client	PDF document relating to above-email.	
1852					1/28/15 8:06 PM	Attorney-Client	PDF document relating to above-email.	
1853	David Daleiden	Ovide Lamontagne			1/28/15 10:10 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information	
1854	Ovide Lamontagne	David Daleiden			1/29/15 10:05 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
1855	Ovide Lamontagne	David Daleiden	Charmaine Yoest		1/30/15 3:50 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements and nonprofit corporations.	
1857	Troy Newman	David Daleiden	Ovide Lamontagne		2/4/15 1:51 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding planning	
1858	David Daleiden	Ovide Lamontagne			2/4/15 9:57 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices	
1859	Ovide Lamontagne	David Daleiden			2/4/15 10:47 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information	
1860					2/4/15 10:47 PM	Attorney-Client	Word document relating to above-email.	
1861	David Daleiden	Ovide Lamontagne	Charmaine Yoest		2/5/15 9:38 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information, legal strategy	
1864	Ovide Lamontagne	David Daleiden	Charmaine Yoest		2/5/15 10:36 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy, arrangements	
1865	David Daleiden	Ovide Lamontagne	Charmaine Yoest		2/6/15 4:30 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy, arrangements	
1866	Ovide Lamontagne	David Daleiden	Charmaine Yoest		2/6/15 12:33 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy, arrangements	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1867	David Daleiden	Ovide Lamontagne, Charmaine Yoest, Albin Rhomberg, Troy Newman			2/6/15 10:45 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods.	
1868	Charmaine Yoest	David Daleiden	Ovide Lamontagne, Albin Rhomberg, Troy Newman		2/6/15 10:47 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding the criminal prosecution of fetal tissue procurement and investigative journalism methods.	
1869	Ovide Lamontagne	David Daleiden, Charmaine Yoest			2/6/15 11:09 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding the criminal prosecution of fetal tissue procurement and investigative journalism methods.	
1870	Troy Newman	Charmaine Yoest	David Daleiden, Ovide Lamontagne, Albin Rhomberg		2/9/15 7:22 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding the criminal prosecution of fetal tissue procurement and investigative journalism methods.	
1872	David Daleiden	Ovide Lamontagne			2/9/15 8:53 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding planning	
1873	Ovide Lamontagne	David Daleiden			2/9/15 8:55 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding planning	
1874	Ovide Lamontagne	David Daleiden			2/9/15 10:45 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	
1875	David Daleiden	Ovide Lamontagne			2/9/15 11:05 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices, pertinent facts or information, legal strategy	
1876	Ovide Lamontagne	David Daleiden			2/9/15 11:15 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal arrangements	
1877					2/9/15 11:15 PM	Attorney-Client	Word document relating to above-email.	
1878	David Daleiden	Ovide Lamontagne			2/10/15 9:33 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal arrangements	
1879					2/10/15 9:33 PM	Attorney-Client	PDF document relating to above-email.	
1880	Ovide Lamontagne	David Daleiden			2/10/15 9:52 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal arrangements	
1881	David Daleiden	David Daleiden			2/12/15 3:25 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
1882	David Daleiden	Ovide Lamontagne			2/12/15 9:00 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices	
1883	Ovide Lamontagne	David Daleiden			2/12/15 11:28 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices, arrangements	
1885	Ovide Lamontagne	David Daleiden			2/13/15 12:01 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding planning	
1886	David Daleiden	Ovide Lamontagne, Charmaine Yoest			2/17/15 6:39 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information	
1887	David Daleiden	Ovide Lamontagne			2/17/15 7:18 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices, regarding pertinent facts or information	
1890	Ovide Lamontagne	David Daleiden, Charmaine Yoest			2/17/15 7:28 PM	Attorney-Client	Confidential email chain providing legal communication with counsel regarding pertinent facts or information	
1893	David Daleiden	Ovide Lamontagne, Charmaine Yoest			2/17/15 9:33 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements, regarding pertinent facts or information	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1894	David Daleiden	Ovide Lamontagne			2/17/15 10:27 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices	
1895	David Daleiden	Ovide Lamontagne			2/17/15 11:06 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices	
1896	David Daleiden	Ovide Lamontagne			2/18/15 7:05 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information	
1897	Ovide Lamontagne	David Daleiden			2/18/15 7:11 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information	
1898	Charmaine Yoest	David Daleiden, Ovide Lamontagne			2/18/15 10:23 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements, regarding pertinent facts or information	
1899	David Daleiden	Ovide Lamontagne			2/19/15 7:15 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices	
1900	Ovide Lamontagne	David Daleiden			2/19/15 10:13 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices	
1901	David Daleiden	Ovide Lamontagne			2/19/15 10:25 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy and pertinent facts or information	
1902	David Daleiden	Charmaine Yoest	Ovide Lamontagne		2/19/15 11:17 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements, regarding pertinent facts or information	
1903	Ovide Lamontagne	David Daleiden			2/20/15 2:12 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information	
1904					2/20/15 2:12 PM	Attorney-Client	Word document relating to above-email.	
1905	Ovide Lamontagne	David Daleiden			2/20/15 6:22 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	
1906					2/20/15 6:22 PM	Attorney-Client	PDF document relating to above-email.	
1907	Ovide Lamontagne	David Daleiden			2/23/15 8:16 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
1908	David Daleiden	Ovide Lamontagne			2/23/15 8:41 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
1909	Ovide Lamontagne	David Daleiden			2/23/15 8:42 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	Some Redactions
1910	David Daleiden	Ovide Lamontagne			2/23/15 9:01 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding investigative journalism methods	
1911					2/23/15 9:01 PM	Attorney-Client	PDF document relating to above-email.	
1912	Ovide Lamontagne	David Daleiden			2/24/15 12:40 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding investigative journalism methods	
1913	David Daleiden	Ovide Lamontagne			2/24/15 7:17 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding investigative journalism methods	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1914	Ovide Lamontagne	David Daleiden			2/24/15 7:22 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding investigative journalism methods	
1915	David Daleiden	Ovide Lamontagne			2/24/15 7:34 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding investigative journalism methods	
1916	David Daleiden	Ovide Lamontagne			2/24/15 7:43 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding investigative journalism methods	
1917	David Daleiden	Ovide Lamontagne			2/24/15 7:47 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices	
1921	David Daleiden	Phill Kline, Hannah Tomlinson	Claude Allen		2/24/15 7:49 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices	
1922	David Daleiden	Phill Kline, Hannah Tomlinson	Claude Allen		2/24/15 7:51 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	
1926	Hannah Tomlinson	David Daleiden	Phill Kline, Claude Allen		2/24/15 8:53 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements and pertinent information	Some Redactions
1927	David Daleiden	Ovide Lamontagne, Jeanneane Maxon			2/24/15 11:06 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices	
1928	Jeanneane Maxon	David Daleiden, Ovide Lamontagne			2/24/15 11:09 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices, legal counsel	
1929	David Daleiden	Jeanneane Maxon	Ovide Lamontagne		2/24/15 11:18 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices, legal counsel	
1930	Jeanneane Maxon	David Daleiden	Ovide Lamontagne		2/24/15 11:20 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices, regarding pertinent facts or information	
1931	David Daleiden	Jeanneane Maxon	Ovide Lamontagne		2/24/15 11:24 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices, regarding pertinent facts or information	
1932	Jeanneane Maxon	David Daleiden	Ovide Lamontagne		2/24/15 11:25 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices, regarding pertinent facts or information	
1933	Jeanneane Maxon	David Daleiden	Ovide Lamontagne		2/24/15 11:30 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices, regarding pertinent facts or information	
1935	Jeanneane Maxon	David Daleiden	Ovide Lamontagne		3/2/15 9:16 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information, legal strategy	
1936					3/2/15 9:16 PM	Attorney-Client	Word document relating to above-email.	
1937					3/2/15 9:16 PM	Attorney-Client	Word document relating to above-email.	
1938	Ovide Lamontagne	David Daleiden			3/3/15 3:22 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information	
1939	Jeanneane Maxon	David Daleiden	Ovide Lamontagne		3/3/15 6:49 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
1940					3/3/15 6:49 PM	Attorney-Client	Word document relating to above-email.	
1941					3/3/15 6:49 PM	Attorney-Client	Word document relating to above-email.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1942	David Daleiden	Jeanneane Maxon	Ovide Lamontagne		3/3/15 7:24 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
1943	Jeanneane Maxon	David Daleiden	Ovide Lamontagne		3/3/15 7:31 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
1944	David Daleiden	Jeanneane Maxon	Ovide Lamontagne		3/3/15 7:38 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
1945					3/3/15 7:38 PM	Attorney-Client	PDF document relating to above-email.	
1946	Jeanneane Maxon	David Daleiden	Ovide Lamontagne		3/3/15 7:46 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	
1947	David Daleiden	Ovide Lamontagne	Charmaine Yoest, Jeanneane Maxon		3/3/15 11:19 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information	
1948	David Daleiden	Ovide Lamontagne			3/4/15 1:51 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information	
1949	David Daleiden	Ovide Lamontagne			3/4/15 7:59 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information and legal strategy	
1950					3/4/15 7:59 AM	Attorney-Client	Word document relating to above-email.	
1952	Ovide Lamontagne	David Daleiden			3/4/15 1:44 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices, legal strategy, and pertinent facts or information	
1953					3/4/15 1:44 PM	Attorney-Client	Word document relating to above-email.	
1954	Jeanneane Maxon	David Daleiden, Ovide Lamontagne	Charmaine Yoest		3/4/15 2:02 PM	Attorney-Client	Confidential email chain providing legal communication with counsel regarding pertinent facts or information	
1955	Jeanneane Maxon	David Daleiden	Ovide Lamontagne		3/4/15 2:10 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	
1958	David Daleiden	Ovide Lamontagne			3/5/15 8:16 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices	
1959					3/5/15 8:16 AM	Attorney-Client	Word document relating to above-email.	
1960					3/5/15 8:16 AM	Attorney-Client	PDF document relating to above-email.	
1961	Ovide Lamontagne	David Daleiden			3/5/15 1:29 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices and legal strategy	
1962					3/5/15 1:29 PM	Attorney-Client	Word document relating to above-email.	
1963	David Daleiden	Ovide Lamontagne			3/5/15 8:32 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices, and legal strategy	
1965	David Daleiden	Ovide Lamontagne			3/5/15 9:09 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices	
1966					3/5/15 9:09 PM	Attorney-Client	Word document relating to above-email.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1967					3/5/15 9:09 PM	Attorney-Client	PDF document relating to above-email.	
1968	Ovide Lamontagne	David Daleiden			3/5/15 9:16 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information	
1969	Ovide Lamontagne	David Daleiden			3/5/15 9:22 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	
1971	David Daleiden	Ovide Lamontagne			3/5/15 9:58 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices and pertinent facts or information	
1972					3/5/15 9:58 PM	Attorney-Client	PDF document relating to above-email.	
1973	David Daleiden	Ovide Lamontagne, Charmaine Yoest, Jeanneane Maxon			3/6/15 12:28 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information	
1974	David Daleiden	Charmaine Yoest, Ovide Lamontagne, Jeanneane Maxon	Troy Newman, Albin Rhombert, Jim Holman		3/6/15 1:45 AM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods.	
1975	Charmaine Yoest	David Daleiden, Ovide Lamontagne, Jeanneane Maxon			3/6/15 4:27 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information	
1976	David Daleiden	Anna Bettisworth			3/6/15 5:33 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods.	
1979	Ovide Lamontagne	David Daleiden			3/6/15 11:57 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices	Earlier email produced; forward to client withheld.
1980	David Daleiden	Ovide Lamontagne			3/7/15 12:21 AM	Attorney-Client	Confidential email chain providing legal communication with counsel regarding legality of fetal tissue procurement practices	Earlier email produced; forward to client withheld.

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
1981	Ovide Lamontagne	David Daleiden			3/7/15 12:32 AM	Attorney-Client	Confidential email chain providing legal communication with counsel regarding legality of fetal tissue procurement practices	
1982	David Daleiden	Elizabeth Shearer			3/9/15 5:01 AM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods.	
1989	David Daleiden	Ovide Lamontagne			3/9/15 7:37 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	
1990	Troy Newman	David Daleiden	Charmaine Yoest, Ovide Lamontagne, Jeanneane Maxon, Albin Rhomberg, Jim Holman		3/9/15 7:51 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods	Some Redactions
1991	Ovide Lamontagne	David Daleiden			3/9/15 8:28 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	Earlier email produced; forward to client withheld.
1992	David Daleiden	Troy Newman	Charmaine Yoest, Ovide Lamontagne, Jeanneane Maxon, Albin Rhomberg, Jim Holman		3/9/15 8:44 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods	Some Redactions
1993	David Daleiden	Ovide Lamontagne			3/10/15 3:09 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	
1998	Ovide Lamontagne	David Daleiden			3/10/15 5:58 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information	
2000	Ovide Lamontagne	David Daleiden			3/10/15 6:02 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	
2002	David Daleiden	Ovide Lamontagne			3/10/15 7:26 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information	
2003	David Daleiden	Claude Allen			3/10/15 7:28 PM	Attorney-Client	Confidential email providing legal communication with counsel reflecting investigative journalism methods as well as the legality of fetal tissue procurement practices	
2007	David Daleiden	Ovide Lamontagne			3/11/15 1:06 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	
2008	Ovide Lamontagne	David Daleiden			3/11/15 12:01 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	
2009	David Daleiden	Ovide Lamontagne			3/11/15 12:29 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	
2010	David Daleiden	Jeanneane Maxon	Ovide Lamontagne		3/11/15 12:30 PM	Attorney-Client	Confidential email providing legal communication with counsel reflecting legal arrangements	
2011	Ovide Lamontagne	David Daleiden			3/11/15 12:31 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
2012	David Daleiden	Ovide Lamontagne			3/11/15 12:32 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	
2013					3/11/15 12:32 PM	Attorney-Client	Word document relating to above-email.	
2014	David Daleiden	Ovide Lamontagne			3/11/15 1:37 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information, legality of fetal tissue procurement practices	
2015					3/11/15 1:37 PM	Attorney-Client	Word document relating to above-email.	
2016	Ovide Lamontagne	David Daleiden			3/11/15 1:48 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information, legality of fetal tissue procurement practices, legal strategy	
2017					3/11/15 1:48 PM	Attorney-Client	Word document relating to above-email.	
2019	Jeanneane Maxon	David Daleiden, Twanna Spurgeon	Ovide Lamontagne		3/11/15 6:11 PM	Attorney-Client	Confidential email providing legal communication with counsel reflecting legal arrangements	
2020	Twanna Spurgeon	Jeanneane Maxon, David Daleiden	Ovide Lamontagne		3/11/15 6:54 PM	Attorney-Client	Confidential email providing legal communication with counsel reflecting legal arrangements	
2021	Ovide Lamontagne	David Daleiden			3/12/15 2:40 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
2022	David Daleiden	Ovide Lamontagne			3/12/15 2:50 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
2023	Ovide Lamontagne	David Daleiden			3/12/15 2:57 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
2027	David Daleiden	Charmaine Yoest, Ovide Lamontagne			3/13/15 1:06 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	Some Redactions
2030	Ovide Lamontagne	David Daleiden			3/13/15 2:40 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	
2032	Ovide Lamontagne	David Daleiden			3/13/15 7:19 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information	
2033	David Daleiden	Ovide Lamontagne			3/13/15 7:51 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information	
2034	Hannah Tomlinson	David Daleiden			3/13/15 8:17 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2035	Charmaine Yoest	Ovide Lamontagne, David Daleiden			3/13/15 9:45 PM	Attorney-Client	Confidential email providing legal communication with counsel reflecting legal arrangements	
2036	Charmaine Yoest	Ovide Lamontagne, David Daleiden			3/13/15 9:46 PM	Attorney-Client	Confidential email providing legal communication with counsel reflecting legal arrangements	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
2037	David Daleiden	Charmaine Yoest	Ovide Lamontagne		3/13/15 9:54 PM	Attorney-Client	Confidential email providing legal communication with counsel reflecting legal arrangements	
2038	David Daleiden	Hannah Tomlinson			3/13/15 9:55 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2039	Hannah Tomlinson	David Daleiden			3/13/15 9:57 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2044	David Daleiden	Ovide Lamontagne			3/16/15 12:37 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	
2047	David Daleiden	Ovide Lamontagne, Charmaine Yoest, Jeanneane Maxon			3/16/15 7:27 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	
2048					3/16/15 7:27 PM	Attorney-Client	Word document relating to above-email.	
2049	David Daleiden	Ovide Lamontagne, Charmaine Yoest, Jeanneane Maxon			3/16/15 7:59 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	
2050					3/16/15 7:59 PM	Attorney-Client	PDF document relating to above-email.	
2051	Charmaine Yoest	David Daleiden, Ovide Lamontagne, Jeanneane Maxon			3/16/15 8:13 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	
2052	David Daleiden	Charmaine Yoest	Ovide Lamontagne, Jeanneane Maxon		3/16/15 8:29 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	
2053	Ovide Lamontagne	David Daleiden, Charmaine Yoest, Jeanneane Maxon			3/16/15 8:38 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy, legality of fetal tissue procurement practices, pertinent information	
2054					3/16/15 8:38 PM	Attorney-Client	Word document relating to above-email.	
2055	David Daleiden	Claude Allen	Charmaine Yoest, Ovide Lamontagne, Jeanneane Maxon		3/16/15 9:00 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	
2056					3/16/15 9:00 PM	Attorney-Client	PDF document relating to above-email.	
2057	Ovide Lamontagne	David Daleiden	Charmaine Yoest, Jeanneane Maxon		3/19/15 3:35 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal planning	
2058	David Daleiden	Ovide Lamontagne	Charmaine Yoest, Jeanneane Maxon		3/19/15 3:40 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal planning	
2059	Andy Moore	David Daleiden			3/20/15 2:24 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	
2061					3/20/15 2:24 AM	Attorney-Client	Word document relating to above-email.	
2062	David Daleiden	Charmaine Yoest, Ovide Lamontagne, Jeanneane Maxon			3/20/15 4:54 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
2064	David Daleiden	Claude Allen			3/20/15 12:07 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2066	David Daleiden	Ovide Lamontagne	Charmaine Yoest, Jeanneane Maxon		3/26/15 6:32 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information	
2067	Claude Allen	David Daleiden,Ovide Lamontagne			3/26/15 2:50 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding nonprofit corporations	
2068	David Daleiden	Phill Kline, Hannah Tomlinson			3/27/15 8:05 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2069	David Daleiden	Ovide Lamontagne, Claude Allen			3/27/15 8:05 PM	Attorney-Client	Confidential email providing legal communication with counsel reflecting legality of fetal tissue procurement practices	
2070	Hannah Tomlinson	David Daleiden			3/27/15 9:07 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods.	Some Redactions
2071	David Daleiden	Ovide Lamontagne			3/28/15 2:51 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information	
2072	David Daleiden	Ovide Lamontagne			3/28/15 3:08 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information	
2073	David Daleiden	Ovide Lamontagne			3/30/15 12:44 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information	
2074					3/30/15 12:44 AM	Attorney-Client	PDF document relating to above-email.	
2075	Ovide Lamontagne	David Daleiden			3/30/15 1:08 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information	
2076	David Daleiden	Ovide Lamontagne			3/30/15 1:13 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information	
2077	Ovide Lamontagne	David Daleiden			3/30/15 1:20 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding planning	
2078	David Daleiden	Hannah Tomlinson			3/30/15 1:25 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	Some Redactions
2079	Hannah Tomlinson	David Daleiden			3/30/15 3:11 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	Some Redactions
2080	David Daleiden	Phill Kline, Hannah Tomlinson			3/30/15 10:10 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
2081	David Daleiden	Phill Kline, Hannah Tomlinson, Claude Allen			3/30/15 10:21 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information	
2082	David Daleiden	Ovide Lamontagne			3/31/15 7:59 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information	
2083					3/31/15 7:59 AM	Attorney-Client	Word document relating to above-email.	
2084	David Daleiden	Claude Allen			3/31/15 8:11 AM	Attorney-Client	Confidential email providing legal communication with counsel reflecting legal planning	
2085					3/31/15 8:11 AM	Attorney-Client	PDF document relating to above-email.	
2086	David Daleiden	Elizabeth Shearer			3/31/15 3:57 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel reflecting legal planning	
2087					3/31/15 3:57 PM	Attorney-Client	PDF document relating to above-email.	
2088	Ovide Lamontagne	David Daleiden			3/31/15 8:18 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding planning	
2089					3/31/15 8:18 PM	Attorney-Client	Word document relating to above-email.	
2090	David Daleiden	Ovide Lamontagne			3/31/15 8:48 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding planning	
2091	David Daleiden	Ovide Lamontagne			4/1/15 1:52 AM	Attorney-Client	Confidential email chain providing legal communication with counsel regarding legal strategy	
2092	David Daleiden	Ovide Lamontagne			4/1/15 8:01 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	
2093					4/1/15 8:01 AM	Attorney-Client	Word document relating to above-email.	
2097	Ovide Lamontagne	David Daleiden			4/2/15 11:44 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information	Earlier email produced; forward to client withheld.
2099	David Daleiden	Phill Kline, Hannah Tomlinson			4/2/15 8:04 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2100					4/2/15 8:04 PM	Attorney-Client	PDF document relating to above-email.	
2101	Hannah Tomlinson	David Daleiden			4/2/15 8:42 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2102	Phill Kline	David Daleiden, Hannah Tomlinson			4/2/15 8:43 PM	Attorney-Client	Confidential email requesting information from client for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
2103	Phill Kline	Hannah Tomlinson, David Daleiden			4/2/15 8:48 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding legality of fetal tissue procurement practices.	
2104	David Daleiden	Phill Kline	Hannah Tomlinson		4/2/15 9:18 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
2105	David Daleiden	Phill Kline	Hannah Tomlinson		4/2/15 9:19 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
2106	Phill Kline	David Daleiden			4/2/15 9:59 PM	Attorney-Client	Confidential email requesting information from client for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
2107	Ovide Lamontagne	David Daleiden			4/3/15 10:05 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information	Earlier email produced; forward to client withheld.
2108	Ovide Lamontagne	David Daleiden			4/6/15 5:42 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information and planning	Earlier email produced; forward to client withheld.
2109	Hannah Tomlinson	David Daleiden			4/7/15 9:31 PM	Attorney-Client	Confidential email providing legal communication with counsel reflecting legal arrangements	
2110	Hannah Tomlinson	David Daleiden			4/7/15 9:35 PM	Attorney-Client	Confidential email providing legal communication with counsel reflecting legal arrangements	
2111	David Daleiden	Hannah Tomlinson	Phill Kline, Claude Allen		4/7/15 9:45 PM	Attorney-Client	Confidential email providing legal communication with counsel reflecting legal arrangements and the legality of fetal tissue procurement practices	
2112	Hannah Tomlinson	David Daleiden	Phill Kline, Claude Allen		4/7/15 11:14 PM	Attorney-Client	Confidential email providing legal communication with counsel reflecting legality of fetal tissue procurement practices	
2113	David Daleiden	Charmaine Yoest, Ovide Lamontagne, Jeanneane Maxon	Troy Newman, Albin Rhomberg, Jim Holman		4/9/15 11:33 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods.	
2114	Ovide Lamontagne	David Daleiden			4/9/15 11:58 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods.	Some Redactions
2115	Troy Newman	David Daleiden	Charmaine Yoest, Ovide Lamontagne, Jeanneane Maxon, Albin Rhomberg, Jim Holman		4/10/15 12:13 AM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods.	Some Redactions
2116	Jeanneane Maxon	David Daleiden, Charmaine Yoest, Ovide Lamontagne	Troy Newman, Albin Rhomberg, Jim Holman		4/10/15 1:41 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods.	Some Redactions
2117	Hannah Tomlinson	David Daleiden			4/13/15 4:13 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2118	David Daleiden	Hannah Tomlinson			4/13/15 4:56 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
2119	David Daleiden	Claude Allen			4/13/15 5:09 PM	Attorney-Client	Confidential email providing legal communication with counsel reflecting investigative journalism methods	
2120	Hannah Tomlinson	David Daleiden	Phill Kline		4/13/15 6:10 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2121	David Daleiden	Ovide Lamontagne			4/13/15 10:05 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices and pertinent facts or information	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
2125	Ovide Lamontagne	David Daleiden			4/14/15 12:14 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	
2126	David Daleiden	Charmaine Yoest, Ovide Lamontagne, Jeanneane Maxon, Claude Allen			4/15/15 12:51 AM	Attorney-Client	Confidential email providing legal communication with counsel reflecting legality of fetal tissue procurement practices	
2127	David Daleiden	Ovide Lamontagne	Claude Allen		4/15/15 5:11 PM	Attorney-Client	Confidential email providing legal communication with counsel reflecting legal planning and arrangements	
2128	David Daleiden	Casey Mattox			4/15/15 6:04 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices.	
2129	David Daleiden	Claude Allen			4/15/15 9:03 PM	Attorney-Client	Confidential email providing legal communication with counsel reflecting legal planning	
2130	Casey Mattox	David Daleiden			4/15/15 10:18 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
2131	David Daleiden	Casey Mattox			4/15/15 10:18 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	Some Redactions
2132	David Daleiden	Claude Allen	Charmaine Yoest, Ovide Lamontagne, Jeanneane Maxon		4/16/15 8:39 AM	Attorney-Client	Confidential email providing legal communication with counsel reflecting legality of fetal tissue procurement practices	
2133	Claude Allen	David Daleiden			4/16/15 12:16 PM	Attorney-Client	Confidential email providing legal communication with counsel reflecting legal planning	
2134	David Daleiden	Ovide Lamontagne			4/16/15 3:57 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
2135	Ovide Lamontagne	David Daleiden			4/16/15 5:11 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
2136	Ovide Lamontagne	David Daleiden			4/16/15 7:32 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices, arrangements	Earlier email produced; forward to client withheld.
2137	David Daleiden	Charmaine Yoest, Ovide Lamontagne, Jeanneane Maxon, Claude Allen			4/16/15 9:13 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2138	David Daleiden	Charmaine Yoest, Ovide Lamontagne, Jeanneane Maxon, Claude Allen			4/16/15 9:33 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2139	David Daleiden	Ovide Lamontagne			4/17/15 1:06 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices, arrangements	
2140	David Daleiden	Anna Bettisworth			4/18/15 12:35 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2141	David Daleiden	Anna Bettisworth			4/18/15 12:36 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2142	Ovide Lamontagne	David Daleiden			4/20/15 2:02 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices, arrangements	Earlier email produced; forward to client withheld.
2143	David Daleiden	Ovide Lamontagne			4/20/15 9:28 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices, arrangements	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
2144	Ovide Lamontagne	David Daleiden			4/20/15 11:18 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices, arrangements	
2145	David Daleiden	Ovide Lamontagne			4/21/15 1:29 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices, arrangements	
2146	David Daleiden	Charmaine Yoest, Ovide Lamontagne, Jeanneane Maxon	Troy Newman, Albin Rhomberg, Claude Allen, Jim Holman		4/23/15 12:33 AM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2147	David Daleiden	Charmaine Yoest, Ovide Lamontagne, Jeanneane Maxon	Troy Newman, Albin Rhomberg, Claude Allen, Jim Holman		4/23/15 12:39 AM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2150	Hannah Tomlinson	David Daleiden			4/25/15 2:49 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2151	David Daleiden	Hannah Tomlinson			4/25/15 7:29 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
2152	Hannah Tomlinson	David Daleiden			4/25/15 11:33 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2153	David Daleiden	Ovide Lamontagne			4/28/15 4:04 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy and pertinent facts or information	
2155	Ovide Lamontagne	David Daleiden			4/28/15 4:20 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy and pertinent facts or information	
2156	Hannah Tomlinson	David Daleiden			4/29/15 2:00 PM	Attorney-Client	Confidential email reflecting legal advice of counsel regarding overall project goals.	
2157	David Daleiden	Casey Mattox	Claude Allen		4/29/15 10:56 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices.	
2158	Casey Mattox	David Daleiden			4/30/15 4:59 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices	
2159	David Daleiden	Casey Mattox	Michael J. Norton		4/30/15 6:21 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices	
2160	Michael J. Norton	David Daleiden	Casey Mattox		4/30/15 6:42 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices	
2161	Michael J. Norton	David Daleiden			5/1/15 3:38 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices	
2162	David Daleiden	Ovide Lamontagne			5/1/15 4:28 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy and legal arrangements	
2163	David Daleiden	Michael J. Norton			5/1/15 4:28 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices	
2164	Michael J. Norton	David Daleiden	Michael J. Norton		5/1/15 4:32 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices	
2165	Ovide Lamontagne	David Daleiden			5/1/15 5:22 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy and legal arrangements	
2166	Ovide Lamontagne	David Daleiden			5/4/15 4:39 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices, arrangements	Earlier email produced; forward to client withheld.
2167	David Daleiden	Ovide Lamontagne			5/4/15 5:25 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices, arrangements	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
2168	David Daleiden	Michael J. Norton, Casey Mattox			5/4/15 5:29 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices.	
2169	Michael J. Norton	David Daleiden, Casey Mattox			5/4/15 5:31 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
2170	David Daleiden	Michael J. Norton, Casey Mattox			5/4/15 5:32 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices.	
2171	David Daleiden	Michael J. Norton	Casey Mattox		5/4/15 5:32 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices.	
2173	David Daleiden	Michael J. Norton, Casey Mattox			5/4/15 5:48 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices.	
2175	David Daleiden	Charmaine Yoest, Ovide Lamontagne, Jeanneane Maxon	Claude Allen		5/4/15 5:55 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding nonprofit corporation	
2176					5/4/15 5:55 PM	Attorney-Client	PDF document relating to above-email.	
2177	Jeanneane Maxon	David Daleiden			5/4/15 6:00 PM	Attorney-Client	Confidential email providing legal communication with counsel reflecting legal arrangements and strategies	
2178	David Daleiden	Ovide Lamontagne			5/4/15 8:20 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding legality of fetal tissue procurement practices	
2182	David Daleiden	Michael J. Norton, Casey Mattox, Ovide Lamontagne			5/5/15 8:13 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices.	
2184	Michael J. Norton	David Daleiden, Casey Mattox, Ovide Lamontagne	Michael J. Norton		5/6/15 2:50 AM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2185	David Daleiden	Michael J. Norton	Casey Mattox, Ovide Lamontagne, Troy Newman, Albin Rhomborg		5/6/15 6:37 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding overall client legal goals and strategy for litigation.	
2186					5/6/15 6:37 PM	Attorney-Client	PDF document relating to above-email.	
2187	Michael J. Norton	David Daleiden	Casey Mattox, Ovide Lamontagne, Natalie Decker, Michael J. Norton		5/6/15 9:15 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding criminal prosecution and criminal law and procedure.	
2190	Hannah Tomlinson	David Daleiden			5/8/15 5:18 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2191	David Daleiden	Hannah Tomlinson	Phill Kline		5/9/15 2:08 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
2192	David Daleiden	Hannah Tomlinson	Phill Kline		5/9/15 2:09 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
2193	David Daleiden	Hannah Tomlinson, Phill Kline			5/9/15 2:12 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
2197	David Daleiden	Hannah Tomlinson, Phill Kline			5/9/15 2:15 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
2198	David Daleiden	Hannah Tomlinson, Phill Kline			5/9/15 2:15 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
2199	David Daleiden	Hannah Tomlinson, Phill Kline			5/9/15 2:17 AM	Attorney-Client	Confidential email containing contract for counsel to provide legal advice regarding such contract.	
2201	David Daleiden	Hannah Tomlinson	Phill Kline		5/9/15 2:41 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
2202	Hannah Tomlinson	David Daleiden	Phill Kline		5/9/15 6:33 AM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2203	Ovide Lamontagne	David Daleiden			5/9/15 12:59 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices, arrangements	Earlier email produced; forward to client withheld.
2204	David Daleiden	Ovide Lamontagne			5/10/15 9:33 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices, arrangements	
2206	Troy Newman	David Daleiden	Brian Chavez-Ochoa		5/11/15 5:36 PM	Attorney-Client	Confidential email regarding providing legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	Some Redactions
2207	David Daleiden	Troy Newman	Brian Chavez-Ochoa		5/11/15 5:45 PM	Attorney-Client	Confidential email regarding providing legal advice of counsel regarding investigative journalism methods and criminal defense legal representation.	Some Redactions
2208	David Daleiden	Albin Rhomberg	Troy Newman, Brian Chavez-Ochoa		5/11/15 6:44 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2209	Troy Newman	David Daleiden	Albin Rhomberg, Brian Chavez-Ochoa		5/11/15 6:59 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods.	
2210	Casey Mattox	David Daleiden			5/14/15 7:25 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding the criminal prosecution of fetal tissue procurement and abortion practices.	
2211	David Daleiden	Brian Chavez-Ochoa	Troy Newman, Albin Rhomberg		5/14/15 11:14 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
2212	David Daleiden	Brian Chavez-Ochoa	Troy Newman, Albin Rhomberg		5/14/15 11:17 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
2213	David Daleiden	Brian Chavez-Ochoa	Troy Newman, Albin Rhomberg		5/14/15 11:20 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
2217	Albin Rhomberg	David Daleiden			5/15/15 2:43 AM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2218	Troy Newman	David Daleiden	Brian Chavez-Ochoa, Albin Rhomberg		5/18/15 1:56 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding legality of fetal tissue procurement practices.	
2219	David Daleiden	Troy Newman	Brian Chavez-Ochoa, Albin Rhomberg		5/18/15 5:55 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
2220	David Daleiden	Michael J. Norton, Casey Mattox, Ovide Lamontagne			5/18/15 6:21 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices.	
2221	David Daleiden	Claude Allen			5/18/15 6:29 PM	Attorney-Client	Confidential email providing legal communication with counsel reflecting legal arrangements	
2222	David Daleiden	Hannah Tomlinson	Phill Kline, Claude Allen		5/18/15 6:49 PM	Attorney-Client	Confidential email providing legal communication with counsel reflecting legality of fetal tissue procurement practices and investigative journalism methods	
2223	David Daleiden	Troy Newman, Albin Rhombert, Brian Chavez-Ochoa			5/18/15 6:52 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods.	
2224	Hannah Tomlinson	David Daleiden	Phill Kline, Claude Allen		5/18/15 7:19 PM	Attorney-Client	Confidential email providing legal communication with counsel reflecting legality of fetal tissue procurement practices and investigative journalism methods	
2225	Michael J. Norton	David Daleiden, Casey Mattox, Ovide Lamontagne, Michael J. Norton			5/18/15 7:31 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding legality of fetal tissue procurement practices.	
2227	David Daleiden	Ovide Lamontagne	Michael J. Norton, Casey Mattox		5/18/15 8:00 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
2228	David Daleiden	Hannah Tomlinson	Phill Kline, Claude Allen		5/18/15 9:00 PM	Attorney-Client	Confidential email providing legal communication with counsel reflecting legality of fetal tissue procurement practices and investigative journalism methods	
2229	Michael J. Norton	David Daleiden	Michael J. Norton		5/18/15 9:24 PM	Attorney-Client	Confidential email regarding providing legal advice of counsel relating to investigative journalism methods and legality of fetal tissue procurement practices.	
2230					5/18/15 9:24 PM	Attorney-Client	PDF document relating to above-email.	
2231	David Daleiden	Troy Newman, Albin Rhombert	Ovide Lamontagne, Charmaine Yoest, Jeanneane Maxon, Claude Allen		5/18/15 9:49 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding hiring outside counsel to represent client.	
2232					5/18/15 9:49 PM	Attorney-Client	PDF document relating to above-email.	
2233	Troy Newman	David Daleiden	Albin Rhombert, Ovide Lamontagne, Charmaine Yoest, Jeanneane Maxon, Claude Allen		5/19/15 2:50 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding hiring outside counsel to represent client.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
2234	David Daleiden	Albin Rhomberg, Troy Newman, Ovide Lamontagne, Charmaine Yoest, Jeanneane Maxon, Jim Holman, Claude Allen, Casey Mattox, Michael J. Norton			5/19/15 5:42 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2235	Troy Newman	David Daleiden	Albin Rhomberg, Ovide Lamontagne, Charmaine Yoest, Jeanneane Maxon, Jim Holman, Claude Allen, Casey Mattox, Michael J. Norton		5/19/15 6:02 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2236	David Daleiden	Troy Newman	Brian Chavez-Ochoa, Albin Rhomberg, Claude Allen, Ovide Lamontagne		5/19/15 6:32 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
2237	Ovide Lamontagne	David Daleiden			5/19/15 7:25 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2238	Troy Newman	David Daleiden			5/19/15 7:37 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
2239	Charmaine Yoest	David Daleiden			5/19/15 8:48 PM	Attorney-Client	Confidential email requesting information from client for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
2240	Michael J. Norton	David Daleiden	Albin Rhomberg, Troy Newman, Ovide Lamontagne, Charmaine Yoest, Jeanneane Maxon, Jim Holman, Claude Allen, Casey Mattox		5/20/15 1:28 AM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2241	David Daleiden	Michael J. Norton	Albin Rhomberg, Troy Newman, Ovide Lamontagne, Charmaine Yoest, Jeanneane Maxon, Father Claude Williams, Claude Allen		5/21/15 4:39 PM	Attorney-Client Privilege; Clergy-Communicant Privilege	Confidential email containing client information for outside counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
2242	Father Claude Williams	David Daleiden			5/21/15 4:42 PM	Attorney-Client Privilege; Clergy-Communicant Privilege	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
2243	David Daleiden	Ovide Lamontagne			5/21/15 4:51 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
2244	David Daleiden	Charmaine Yoest			5/21/15 4:52 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2245	Albin Rhomberg	David Daleiden			5/21/15 4:56 PM	Attorney-Client	Confidential email containing legal advice from counsel regarding client negotiation with prospective co-counsel.	
2246	Charmaine Yoest	David Daleiden			5/21/15 5:18 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2247	Ovide Lamontagne	David Daleiden			5/21/15 5:42 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2248	David Daleiden	Charmaine Yoest			5/21/15 6:16 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2249	David Daleiden	Ovide Lamontagne			5/21/15 6:21 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2250	Michael J. Norton	David Daleiden	Casey Mattox		5/22/15 1:16 AM	Attorney-Client	Confidential email regarding seeking legal advice regarding client legal representation.	
2251	Charmaine Yoest	David Daleiden			5/22/15 5:57 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2252	Hannah Tomlinson	David Daleiden			5/22/15 8:54 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2253	David Daleiden	Albin Rhomberg, Troy Newman, Brian Chavez-Ochoa			5/23/15 4:32 AM	Attorney-Client	Confidential email attachment containing information from client for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
2254	Brian Chavez-Ochoa	David Daleiden			5/23/15 5:26 AM	Attorney-Client	Confidential email requesting information from client for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
2255	David Daleiden	Brian Chavez-Ochoa			5/23/15 6:14 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
2256	Brian Chavez-Ochoa	David Daleiden			5/23/15 2:32 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
2258	David Daleiden	Albin Rhomberg, Troy Newman, Claude Allen	Charmaine Yoest, Ovide Lamontagne, Michael J. Norton, Casey Mattox		5/24/15 6:28 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2259	David Daleiden	Charmaine Yoest, Ovide Lamontagne, Jeanneane Maxon	Troy Newman, Albin Rhomberg, Brian Chavez-Ochoa, Michael J. Norton, Casey Mattox		5/24/15 7:54 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
2262	David Daleiden	Hannah Tomlinson			5/27/15 8:06 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2263	David Daleiden	Brian Chavez-Ochoa	Troy Newman, Albin Rhomberg		5/27/15 8:08 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
2264	David Daleiden	Hannah Tomlinson, Phill Kline	Claude Allen		5/27/15 8:51 PM	Attorney-Client	Confidential email providing legal communication with counsel reflecting legality of fetal tissue procurement practices and investigative journalism methods	
2265	David Daleiden	Phill Kline, Hannah Tomlinson	Claude Allen		5/27/15 9:02 PM	Attorney-Client	Confidential email providing legal communication with counsel reflecting investigative journalism methods as well as the legality of fetal tissue procurement	
2266	David Daleiden	Brian Chavez-Ochoa	Troy Newman, Albin Rhomberg		5/27/15 9:12 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
2267	David Daleiden	Brian Chavez-Ochoa	Troy Newman, Albin Rhomberg		5/27/15 9:27 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2268	Ovide Lamontagne	David Daleiden			5/28/15 11:28 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
2269	David Daleiden	Ovide Lamontagne			5/28/15 2:05 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
2270	Ovide Lamontagne	David Daleiden			5/28/15 2:11 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
2271	Troy Newman	David Daleiden	Brian Chavez-Ochoa, Albin Rhomberg		5/28/15 4:30 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2272	Troy Newman	David Daleiden	Brian Chavez-Ochoa, Albin Rhomberg		5/28/15 4:31 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods.	
2273	Ovide Lamontagne	David Daleiden	Jeanneane Maxon		5/28/15 6:23 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding investigative journalism methods	
2274	Jeanneane Maxon	Ovide Lamontagne, David Daleiden			5/28/15 6:31 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information	
2275	Ovide Lamontagne	Jeanneane Maxon, David Daleiden			5/28/15 6:34 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding planning	
2276	Ovide Lamontagne	David Daleiden			5/28/15 8:43 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
2279	David Daleiden	Claude Allen, Albin Rhomberg, Troy Newman, Jim Holman			5/31/15 12:51 AM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email requesting legal advice of counsel regarding investigative journalism methods.	
2282	Ovide Lamontagne	David Daleiden			6/1/15 8:48 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	Earlier email produced; forward to client withheld.
2283	David Daleiden	Troy Newman	Brian Chavez-Ochoa, Albin Rhomberg		6/1/15 9:03 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
2288	David Daleiden	Michael J. Norton			6/2/15 1:43 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices.	
2289	David Daleiden	Albin Rhomberg, Troy Newman, Brian Chavez-Ochoa			6/2/15 8:03 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2290	Brian Chavez-Ochoa	David Daleiden, Troy Newman	Albin Rhomberg		6/2/15 8:25 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods.	
2291	David Daleiden	Ovide Lamontagne, Casey Mattox, Michael J. Norton		Kate Bryan	6/2/15 11:03 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding copyright law.	
2297	David Daleiden	Jeanneane Maxon, Andy Moore, Kate Bryan			6/3/15 11:35 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices	
2298	David Daleiden	Ovide Lamontagne, Troy Newman, Albin Rhomberg			6/3/15 11:42 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding legality of fetal tissue procurement practices.	
2300	Albin Rhomberg	David Daleiden			6/4/15 12:08 AM	Attorney-Client	Confidential email requesting information from client for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
2301	Ovide Lamontagne	David Daleiden			6/4/15 12:49 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding legality of fetal tissue procurement practices.	
2303	Jeanneane Maxon	David Daleiden, Andy Moore, Kate Bryan	Ovide Lamontagne		6/4/15 1:22 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding investigative journalism methods	
2304	Emily Minick	David Daleiden	Ovide Lamontagne		6/4/15 4:08 PM	Attorney-Client	Confidential email requesting legal information regarding legality of fetal tissue procurement practices.	
2306	David Daleiden	Ovide Lamontagne, Denise Burke, Anna Paprocki, Kristi Hamrick, Andy Moore	William Saunders, Clarke Forsythe, Mary Harned, Mailee Smith, Michael Ressegue		6/5/15 6:18 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices, regarding investigative journalism methods	
2307	Ovide Lamontagne	David Daleiden, Denise Burke, Anna Paprocki, Kristi Hamrick, Andy Moore	William Saunders, Clarke Forsythe, Mary Harned, Mailee Smith, Michael Ressegue, Jeanneane Maxon, Charmaine Yoest		6/5/15 6:51 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices, regarding investigative journalism methods	
2308	Hannah Tomlinson	David Daleiden			6/8/15 7:44 PM	Attorney-Client	Confidential email requesting information from client for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	
2309					6/8/15 7:44 PM	Attorney-Client	Word document relating to above-email.	
2310	David Daleiden	Hannah Tomlinson			6/8/15 9:06 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
2311	Hannah Tomlinson	David Daleiden			6/8/15 11:38 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2312	David Daleiden	David Daleiden			6/9/15 8:27 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices	
2313	David Daleiden	Gerardo Adrian Lopez, Ryan Gonzalez, Annamarie Bettisworth	Albin Rhomberg, Troy Newman, Brian Chavez-Ochoa		6/9/15 8:33 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods.	
2314					6/9/15 8:33 AM	Attorney-Client	PDF document relating to above-email.	
2315	Jeanneane Maxon	Ovide Lamontagne	Anna Paprocki, David Daleiden		6/9/15 2:31 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
2316	David Daleiden	Brian Chavez-Ochoa	Troy Newman, Albin Rhomberg		6/9/15 9:39 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods.	
2317	David Daleiden	Ovide Lamontagne			6/9/15 11:34 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2325	Ovide Lamontagne	David Daleiden			6/11/15 3:27 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2326	Ovide Lamontagne	David Daleiden			6/11/15 3:45 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2327	David Daleiden	Ovide Lamontagne			6/11/15 8:40 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2328	Ovide Lamontagne	David Daleiden			6/11/15 8:45 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2329	David Daleiden	Ovide Lamontagne			6/11/15 9:47 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2330	Ovide Lamontagne	David Daleiden			6/11/15 10:39 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2331	David Daleiden	Brian Chavez-Ochoa	Troy Newman, Albin Rhomberg		6/11/15 10:44 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods.	
2332	Ovide Lamontagne	David Daleiden			6/11/15 11:17 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2333	David Daleiden	Ovide Lamontagne, Charmaine Yoest	Troy Newman, Albin Rhomberg		6/11/15 11:28 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2334	Ovide Lamontagne	David Daleiden			6/11/15 11:52 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2335	Troy Newman	David Daleiden	Brian Chavez-Ochoa, Albin Rhomberg		6/12/15 9:20 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
2336	Brian Chavez-Ochoa	Troy Newman	David Daleiden, Albin Rhomberg		6/12/15 9:22 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods.	
2342	Hannah Tomlinson	David Daleiden			6/15/15 2:03 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods.	
2343					6/15/15 2:03 PM	Attorney-Client	Word document relating to above-email.	
2344	David Daleiden	Brian Chavez-Ochoa			6/15/15 9:52 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding the legality of fetal tissue procurement practices.	
2345	David Daleiden	Brian Chavez-Ochoa			6/15/15 9:52 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2346	Brian Chavez-Ochoa	David Daleiden			6/16/15 12:50 AM	Attorney-Client	Confidential email regarding providing legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2347	Brian Chavez-Ochoa	Troy Newman	David Daleiden, Albin Rhomberg		6/16/15 12:51 AM	Attorney-Client	Confidential email regarding providing legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2348	Troy Newman	Brian Chavez-Ochoa	David Daleiden, Albin Rhomberg		6/16/15 12:58 AM	Attorney-Client	Confidential email regarding providing legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2349	David Daleiden	Hannah Tomlinson	Albin Rhomberg		6/16/15 6:32 AM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods.	
2350					6/16/15 6:32 AM	Attorney-Client	Audio file relating to above-email.	
2351					6/16/15 6:32 AM	Attorney-Client	Audio file relating to above-email.	
2352					6/16/15 6:32 AM	Attorney-Client	Audio file relating to above-email.	
2353					6/16/15 6:32 AM	Attorney-Client	Audio file relating to above-email.	
2354					6/16/15 6:32 AM	Attorney-Client	Audio file relating to above-email.	
2356	David Daleiden	Ovide Lamontagne, Charmaine Yoest, Jeanneane Maxon			6/17/15 2:42 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding investigative journalism methods	
2359	Jeanneane Maxon	David Daleiden			6/17/15 4:15 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding investigative journalism methods	
2362	David Daleiden	Troy Newman, Albin Rhomberg, Brian Chavez-Ochoa	Phill Kline, Hannah Tomlinson, Ovide Lamontagne, Claude Allen, Jeanneane Maxon, Casey Mattox, Michael J. Norton		6/17/15 9:26 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
2363	Phill Kline	David Daleiden	Troy Newman, Albin Rhomberg, Brian Chavez-Ochoa, Hannah Tomlinson, Ovide Lamontagne, Claude Allen, Jeanneane Maxon, Casey Mattox, Michael J. Norton		6/17/15 9:31 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods.	
2364	Albin Rhomberg	David Daleiden			6/17/15 9:47 PM	Attorney-Client	Confidential email requesting information from client for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
2365	Brian Chavez-Ochoa	Phill Kline, David Daleiden	Troy Newman, Albin Rhomberg, Hannah Tomlinson, Ovide Lamontagne, Claude Allen, Jeanneane Maxon, Casey Mattox, Michael J. Norton		6/17/15 10:57 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods.	
2366	Ovide Lamontagne	David Daleiden			6/18/15 1:51 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
2367	David Daleiden	Ovide Lamontagne			6/18/15 1:51 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
2370	Albin Rhomberg	David Daleiden			6/18/15 3:37 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods.	
2372	David Daleiden	Brian Chavez-Ochoa	Phill Kline, Troy Newman, Albin Rhomberg, Hannah Tomlinson, Ovide Lamontagne, Claude Allen, Jeanneane Maxon, Casey Mattox, Michael J. Norton		6/18/15 6:36 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2373	David Daleiden	Troy Newman	Brian Chavez-Ochoa, Albin Rhomberg		6/18/15 6:48 PM	Attorney-Client	Confidential email regarding providing legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2376	David Daleiden	Ovide Lamontagne			6/19/15 4:11 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
2377	Ovide Lamontagne	David Daleiden			6/19/15 9:05 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
2379	David Daleiden	Hannah Tomlinson, Phill Kline			6/19/15 6:40 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices and contract.	
2380	David Daleiden	Hannah Tomlinson, Phill Kline			6/19/15 6:41 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding legality of fetal tissue procurement practices and contract.	
2383	Ovide Lamontagne	David Daleiden			6/20/15 7:20 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
2384	David Daleiden	Ovide Lamontagne			6/20/15 7:36 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
2385	Ovide Lamontagne	David Daleiden	Emily Minick		6/20/15 9:25 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
2390	David Daleiden	Leonard Leo	Claude Allen		6/23/15 10:36 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal arrangements	
2391	Leonard Leo	David Daleiden	Claude Allen		6/23/15 2:12 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
2392	David Daleiden	Leonard Leo	Claude Allen, Ray Ruddy		6/23/15 3:01 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices	
2393	David Daleiden	Leonard Leo	Claude Allen, Ray Ruddy		6/23/15 3:22 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices	
2394	Leonard Leo	David Daleiden			6/23/15 7:44 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices	
2395	Ovide Lamontagne	David Daleiden			6/24/15 1:19 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information	
2396	David Daleiden	Ovide Lamontagne			6/24/15 2:20 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
2404	Leonard Leo	David Daleiden	Jonathan Bunch		6/24/15 8:37 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices and pertinent facts or information	
2407	David Daleiden	Leonard Leo	Jonathan Bunch		6/25/15 2:19 PM	Attorney-Client	Confidential email chain providing legal communication with counsel regarding legality of fetal tissue procurement practices	
2410	Jonathan Bunch	David Daleiden			6/26/15 4:47 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	
2411	David Daleiden	Jonathan Bunch			6/26/15 4:53 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	
2413	David Daleiden	Ovide Lamontagne			6/29/15 4:39 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	
2414	Ovide Lamontagne	David Daleiden			6/29/15 4:43 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding arrangements	Some Redactions
2415	David Daleiden	Charmaine Yoest, Ovide Lamontagne	Troy Newman, Albin Rhomberg		6/29/15 4:45 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods.	
2416	Ovide Lamontagne	David Daleiden			6/29/15 7:36 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
2417	David Daleiden	Leonard Leo, Jonathan Bunch, Claude Allen, Ray Ruddy		Troy Newman, Albin Rhombert, Brian Chavez-Ochoa	6/29/15 9:10 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2418	David Daleiden	Brian Chavez-Ochoa	Troy Newman, Albin Rhombert		6/29/15 9:12 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2419	Brian Chavez-Ochoa	David Daleiden, Leonard Leo, Jonathan Bunch, Claude Allen, Ray Ruddy			6/29/15 11:24 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email regarding providing legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2420	Albin Rhombert	David Daleiden			6/30/15 7:20 AM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods.	
2421	David Daleiden	Brian Chavez-Ochoa, Troy Newman, Albin Rhombert			6/30/15 9:25 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2423	David Daleiden	Brian Chavez-Ochoa			6/30/15 9:25 PM	Attorney-Client	Confidential email requesting legal advice of counsel regarding the legality of fetal tissue procurement practices.	
2424	David Daleiden	Ovide Lamontagne, Charmaine Yoest	Troy Newman, Albin Rhombert, Brian Chavez-Ochoa, Casey Mattox		6/30/15 10:08 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2425	Albin Rhombert	David Daleiden			6/30/15 10:51 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods.	
2426	Casey Mattox	David Daleiden	Michael J. Norton		7/1/15 1:16 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2427	Michael J. Norton	David Daleiden	Michael J. Norton, Casey Mattox, Steven H. Aden		7/1/15 2:01 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2428	David Daleiden	Casey Mattox	Michael J. Norton		7/1/15 2:22 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2429	David Daleiden	Michael J. Norton	Casey Mattox, Steven H. Aden		7/1/15 3:01 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2430	David Daleiden	Albin Rhombert, Troy Newman			7/1/15 3:03 PM	Attorney-Client	Confidential email regarding providing legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2431	Troy Newman	David Daleiden	Albin Rhombert		7/1/15 4:26 PM	Attorney-Client	Confidential email regarding providing legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2432	Albin Rhombert	David Daleiden			7/1/15 4:48 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
2433	Michael J. Norton	David Daleiden	Casey Mattox, Steven H. Aden		7/1/15 5:13 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2434					7/1/15 5:13 PM	Attorney-Client	PDF document relating to above-email.	
2435	David Daleiden	Katie Short	Troy Newman, Albin Rhomberg		7/2/15 2:23 AM	Attorney-Client	Confidential email requesting legal advice of counsel regarding the legality of fetal tissue procurement practices.	
2436					7/2/15 2:23 AM	Attorney-Client	Word document relating to above-email.	
2437	Katie Short	David Daleiden			7/2/15 5:33 AM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2438	David Daleiden	Katie Short			7/2/15 5:54 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2439	David Daleiden	Leonard Leo, Jonathan Bunch	Claude Allen, Ray Ruddy		7/2/15 6:54 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding legal planning	
2440	Jonathan Bunch	David Daleiden	Leonard Leo, Claude Allen, Ray Ruddy		7/2/15 6:59 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email chain providing legal communication with counsel regarding legal planning	
2441	David Daleiden	Jonathan Bunch	Leonard Leo, Claude Allen, Ray Ruddy		7/2/15 7:01 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding legal strategy	
2442	Jonathan Bunch	David Daleiden	Leonard Leo, Claude Allen, Ray Ruddy		7/2/15 7:13 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding legal strategy	
2443	David Daleiden	Jonathan Bunch	Leonard Leo, Claude Allen, Ray Ruddy		7/2/15 7:15 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding legal strategy	
2444	Katie Short	David Daleiden			7/2/15 7:19 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding the legality of fetal tissue procurement practices.	
2445					7/2/15 7:19 PM	Attorney-Client	PDF document relating to above-email.	
2446	David Daleiden	Katie Short			7/2/15 7:22 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2447	Katie Short	David Daleiden			7/2/15 7:22 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2448	David Daleiden	Ovide Lamontagne, Charmaine Yoest	Troy Newman, Albin Rhomberg, Brian Chavez-Ochoa, Casey Mattox		7/2/15 7:23 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2449					7/2/15 7:23 PM	Attorney-Client	PDF document relating to above-email.	
2450	Katie Short	David Daleiden			7/2/15 7:23 PM	Attorney-Client	Confidential email requesting information from client for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
2451	Jonathan Bunch	David Daleiden			7/2/15 7:23 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy and legal arrangements	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
2452	Jonathan Bunch	David Daleiden	Leonard Leo, Claude Allen, Ray Ruddy		7/2/15 7:23 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding legal strategy	
2453	David Daleiden	Katie Short			7/2/15 7:24 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2454	David Daleiden	Jonathan Bunch			7/2/15 7:24 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy and legal arrangements	
2455	Ovide Lamontagne	David Daleiden			7/2/15 7:29 PM	Attorney-Client	Confidential email requesting information from client for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
2456	Leonard Leo	David Daleiden	Jonathan Bunch, Claude Allen, Ray Ruddy		7/2/15 7:29 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email chain providing legal communication with counsel regarding legal planning	
2457	Jonathan Bunch	Leonard Leo	David Daleiden, Claude Allen, Ray Ruddy		7/2/15 7:33 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding legal strategy	
2458	David Daleiden	Ovide Lamontagne			7/2/15 8:20 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2459	David Daleiden	Jonathan Bunch	Leonard Leo, Claude Allen, Ray Ruddy		7/2/15 8:28 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding legal strategy	
2465	Charmaine Yoest	David Daleiden, Ovide Lamontagne	Troy Newman, Albin Rhomberg, Brian Chavez-Ochoa, Casey Mattox		7/3/15 9:25 PM	Attorney-Client	Confidential email regarding seeking legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2466	David Daleiden	Jonathan Bunch	Leonard Leo, Claude Allen, Ray Ruddy		7/4/15 4:17 AM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding legal strategy	
2467	Father Claude Williams	David Daleiden			7/4/15 7:27 PM	Attorney-Client Privilege; Clergy-Communicant Privilege	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2469	Kristi Hamrick	David Daleiden			7/6/15 3:18 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices, regarding investigative journalism methods	Some Redactions
2473	David Daleiden	Kristi Hamrick			7/6/15 4:25 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information, legality of fetal tissue procurement practices	Some Redactions
2474	Kristi Hamrick	David Daleiden			7/6/15 4:32 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices. regarding investigative journalism methods, arrangements	Some Redactions
2476	Kristi Hamrick	David Daleiden			7/6/15 4:39 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices, regarding investigative journalism methods	Some Redactions
2478	David Daleiden	Greg Mueller	Claude Allen		7/6/15 6:26 PM	Attorney-Client	Confidential email providing legal communication with counsel reflecting legality of fetal tissue procurement practices	
2479					7/6/15 6:26 PM	Attorney-Client	PDF document relating to above-email.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
2480	David Daleiden	Kristi Hamrick			7/6/15 6:29 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices, regarding investigative journalism methods, legal strategy	Some Redactions
2481	David Daleiden	Kristi Hamrick			7/6/15 6:30 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices, regarding investigative journalism methods, legal strategy	Some Redactions
2483	Kristi Hamrick	David Daleiden			7/6/15 6:32 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices, regarding investigative journalism methods, legal strategy, pertinent information	Some Redactions
2485	David Daleiden	Greg Mueller	Claude Allen		7/6/15 8:34 PM	Attorney-Client	Confidential email providing legal communication with counsel reflecting legality of fetal tissue procurement practices	
2486	David Daleiden	Greg Mueller	Claude Allen		7/6/15 8:52 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legality of fetal tissue procurement practices	
2487	Anna Paprocki	David Daleiden			7/7/15 3:00 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information, planning	
2488	David Daleiden	Leonard Leo, Jonathan Bunch	Claude Allen, Ray Ruddy		7/7/15 7:45 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding pertinent facts or information	
2489	Leonard Leo	David Daleiden	Ray Ruddy, Claude Allen, Jonathan Bunch		7/7/15 10:06 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding pertinent facts or information	
2490	Jonathan Bunch	Leonard Leo	David Daleiden, Ray Ruddy, Claude Allen		7/7/15 10:52 PM	Attorney-Client Privilege; Common Interest Doctrine	Confidential email providing legal communication with counsel regarding legal strategy	
2491	David Daleiden	Anna Paprocki			7/9/15 2:31 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding pertinent facts or information, planning	
2492	David Daleiden	Brian Chavez-Ochoa, Albin Rhomberg, Troy Newman			7/9/15 3:43 AM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2494	David Daleiden	Leonard Leo, Jonathan Bunch	Claude Allen, Troy Newman, Albin Rhomberg, Brian Chavez-Ochoa		7/11/15 8:16 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2495	Leonard Leo	David Daleiden	Brian Chavez-Ochoa, Jonathan Bunch, Albin Rhomberg, Troy Newman, Claude Allen		7/11/15 8:51 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2496	David Daleiden	Leonard Leo	Brian Chavez-Ochoa, Jonathan Bunch, Albin Rhomberg, Troy Newman, Claude Allen		7/11/15 9:05 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
2498	Leonard Leo	David Daleiden			7/11/15 9:52 PM	Attorney-Client	Confidential email requesting information from client for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
2499	David Daleiden	Leonard Leo			7/11/15 10:04 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2500	David Daleiden	Leonard Leo, Jonathan Bunch, Claude Allen			7/12/15 1:21 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal planning	
2501	Leonard Leo	David Daleiden	Claude Allen, Jonathan Bunch		7/12/15 2:27 AM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal planning	
2502	Leonard Leo	David Daleiden			7/12/15 2:35 AM	Attorney-Client	Confidential email requesting information from client for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
2503	Albin Rhomberg	David Daleiden			7/12/15 2:42 AM	Attorney-Client	Confidential email requesting information from client for counsel to provide legal advice regarding investigative journalism methods and the legality of fetal tissue procurement practices.	
2507	David Daleiden	Leonard Leo	Claude Allen, Jonathan Bunch		7/13/15 4:10 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal planning	
2508	Ovide Lamontagne	David Daleiden	Troy Newman		7/13/15 7:56 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	
2509	Troy Newman	Ovide Lamontagne	David Daleiden		7/13/15 8:05 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	
2510	David Daleiden	Troy Newman	Ovide Lamontagne		7/13/15 8:07 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	
2511	Katie Short	David Daleiden			7/13/15 8:10 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2512	Ovide Lamontagne	David Daleiden, Troy Newman			7/13/15 8:15 PM	Attorney-Client	Confidential email providing legal communication with counsel regarding legal strategy	

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
2513	David Daleiden	Katie Short			7/13/15 8:48 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding investigative journalism methods and legality of fetal tissue procurement practices.	
2514	David Daleiden	Katie Short			7/13/15 8:49 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding nonprofit corporations.	
2515	Katie Short	David Daleiden			7/13/15 11:19 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding nonprofit corporations.	
2516	David Daleiden	Katie Short			7/13/15 11:29 PM	Attorney-Client	Confidential email containing client information for counsel to provide legal advice regarding nonprofit corporations.	
2517	David Daleiden	Greg Mueller	Peter Robbio, Claude Allen		7/9/15 1:21 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding how best to manage evidence of criminal activity.	
2518	Greg Mueller	David Daleiden	Peter Robbio, Claude Allen		7/9/15 1:22 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding how best to manage evidence of criminal activity.	
2519	David Daleiden	Greg Mueller	Peter Robbio, Claude Allen		7/9/15 1:23 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding how best to manage evidence of criminal activity.	
2520	David Daleiden	Greg Mueller	Peter Robbio, Claude Allen		7/13/15 12:07 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding how best to manage evidence of criminal activity.	
2521	Greg Mueller	David Daleiden	Peter Robbio, Claude Allen		7/13/15 12:09 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding how best to manage evidence of criminal activity.	
2522	Claude Allen	Greg Mueller	David Daleiden, Peter Robbio		7/13/15 2:02 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding how best to manage evidence of criminal activity.	
2523	Greg Mueller	Claude Allen	David Daleiden, Peter Robbio		7/13/15 2:02 PM	Attorney-Client	Confidential email providing legal advice of counsel regarding how best to manage evidence of criminal activity.	

No.	Name	Description
1	Albin Rhomberg	CMP Board Member
2	Andy Moore	CMP Personnel: website and information technology work
3	Anna Paprocki	CMP Attorney (Americans United for Life)
	Annamarie Davin (nee Bettisworth)	CMP Personnel: undercover investigator and fundraising program manager
5	Brian Chavez-Ochoa	CMP Attorney (Chavez-Ochoa Law Offices; Associated with Alliance Defending Freedom)
6	Brianna Baxter	CMP Personnel: undercover investigator
7	Casey Mattox	CMP Attorney (Alliance Defending Freedom)
8	Catherine Glenn Foster	CMP Attorney (Alliance Defending Freedom)
9	Charmaine Yoest	Law firm staff (Americans United for Life)
10	Clarke Forsythe	CMP Attorney (Americans United for Life)
11	Claude Allen	CMP Attorney
12	Dana Cody	CMP Attorney (Life Legal Defense Foundation)
13	David Bjornstrom	CMP Attorney (Anderson Zeigler APC)
14	David Daleiden	CMP Personnel: undercover investigator and CEO
15	Denise Burke	CMP Attorney (Americans United for Life)
16	Eileen O'Connor	CMP Attorney (Pillsbury Winthrop Shaw Pittman LLP; Associated with Americans United for Life)
17	Elizabeth Shearer	CMP Donor
18	Emily Minick	Law firm staff (Americans United for Life)
19	Father Claude Williams	Spiritual Director
20	Gerardo Adrian Lopez	CMP Personnel: undercover investigator
21	Greg Mueller	Expert Consultant: communications and public relations
22	Hannah Tomlinson	CMP Attorney
23	Jeanneane Maxon	CMP Attorney (Americans United for Life)
24	Jim Holman	CMP Donor
25	Jonathan Bunch	CMP/Claude Allen Attorney

Defendant CMP's Updated Privilege Log

December 19, 2018

#	From	To	CC	BCC	Date	Privilege	Description	Redactions
26	Justin Dugyon						CMP Personnel: research assistant	
27	Kate Bryan						CMP Personnel: communications consultant	
28	Katie Short						CMP Attorney (Life Legal Defense Foundation)	
29	Kevin Bedolla						CMP Attorney (Life Legal Defense Foundation)	
30	Kristi Hamrick						Law firm staff (Americans United for Life)	
31	Leonard Leo						CMP Attorney	
32	Mailee Smith						CMP Attorney (Americans United for Life)	
33	Marcella Ketelhut						Law firm staff (Life Legal Defense Foundation)	
34	Marilyn Kuipers						Law firm staff (Alliance Defending Freedom)	
35	Mary Harned						CMP Attorney (Americans United for Life)	
36	Mary Riley						Law firm staff (Life Legal Defense Foundation)	
37	Mary Taylor						Law firm staff (Americans United for Life)	
38	Matt Bowman						CMP Attorney (Alliance Defending Freedom)	
39	Michael J. Norton						CMP Attorney (Alliance Defending Freedom)	
40	Michael Ressegue						Law firm staff (Americans United for Life)	
41	Natalie Decker						CMP Attorney (Alliance Defending Freedom)	
42	Ovide Lamontagne						CMP Attorney (Americans United for Life)	
43	Peggy Crockett						Law firm staff (Americans United for Life)	
44	Phill Kline						CMP Attorney	
45	Ray Ruddy						CMP Donor	
46	REDACTED						Therapist	
47	Ryan Gonazlez						CMP Personnel: video and media production contractor	
48	Steven H. Aden						CMP Attorney (Alliance Defending Freedom)	
49	Theresa Deisher						Expert Consultant: stem cell and tissue research	
50	Troy Newman						CMP Board Member	
51	Twanna Spurgeon						Law firm staff (Americans United for Life)	
52	William Saunders						CMP Attorney (Americans United for Life)	