



2/29/2008  
GOODBYS CREEK, LLC v. ARCH INSURANCE COMPANY  
 ARCH'S PRIVILEGE LOG

DATE	AUTHOR	RECIPIENT(S)	DESCRIPTION	BASIS FOR CLAIM OF PRIVILEGE
7/25/2007	M. Trocke, Esq.	K. Givens B. Kuhn	E-mail re draft correspondence	Attorney-client
7/25/2007	M. Trocke, Esq.	J. Shiple/SLK	E-mail re draft correspondence	Work product
7/25/2007	L. Tilton/Forcon	M. Trocke, M. Sugar, C. Schnabel, A. Morningslar	E-mail re project completion	Work product
7/25/2007	M. Trocke, Esq.	K. Givens B. Kuhn	E-mail re correspondence with Cranford	Attorney-client
7/25/2007	RL Tilton	C. Schnabel M. Wilbanks K. Givens W. Cline	E-mail re Silver Stream	Work product
7/25/2007	M. Trocke, Esq.	K. Givens B. Kuhn	E-mail re draft correspondence to Goodbys counsel	Attorney-client
7/25/2007	B. Kuhn	M. Trocke, Esq. K. Givens	E-mail re draft correspondence to Goodbys counsel	Attorney-client
7/25/2007	K. Givens	B. Kuhn M. Trocke, Esq.	E-mail re draft correspondence to Goodbys counsel	Attorney-client; work product
7/25/2007	B. Kuhn	K. Givens M. Trocke	E-mail re draft correspondence to Goodbys counsel	Attorney-client; work product
7/25/2007	M. Trocke, Esq.	K. Givens B. Kuhn	E-mail re draft correspondence to Goodbys counsel	Attorney-client; work product
7/25/2007	M. Trocke, Esq.	K. Givens B. Kuhn	E-mail re draft correspondence to Goodbys counsel	Attorney-client; work product
7/25/2007	K. Givens	B. Kuhn M. Trocke, Esq.	E-mail re draft correspondence to Goodbys counsel	Attorney-client; work product
7/25/2007	B. Kuhn	M. Trocke, Esq. K. Givens	E-mail re draft correspondence to Goodbys counsel	Attorney-client; work product
8/1/2007	A. Morningslar/ Forcon	J. Shiple/SLK K. Givens	E-mail re Auchter project documents	Work product
8/1/2007	L. Tilton/Forcon	M. Trocke, Esq.	E-mail re Stark Truss	Work product
8/1/2007	C. Schnabel/Forcon	M. Wilbanks	E-mail re payment of claimants	Work product
8/1/2007	C. Schnabel/Forcon	M. Wilbanks A. Morningslar	E-mail re Cove invoices	Work product

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GOODBYS CREEK, LLC v. ARCH INSURANCE COMPANY  
ARCH'S PRIVILEGE LOG

DATE	AUTHOR	RECIPIENT(S)	DESCRIPTION	BASIS FOR CLAIM OF PRIVILEGE
8/1/2007	C. Schnabel/Forcon	M. Wilbanks A. Morningstar	E-mail re Cove invoices	Work product
8/2/2007	A. Morningstar/ Forcon	C. Schnabel M. Iacobucci K. Givens M. Trocke	E-mail re project costs	Work product
8/2/2007	B. Kuhn	M. Iacobucci	E-mail re Cove invoices	Work product
8/2/2007	M. Iacobucci/Arch	C. Schnabel A. Morningstar	E-mail re Cove invoices	Work product
8/2/2007	C. Schnabel/Forcon	M. Iacobucci A. Morningstar	E-mail re Cove invoices	Work product
8/2/2007	A. Morningstar/ Forcon	C. Schnabel M. Iacobucci K. Givens M. Trocke	E-mail re Cove invoices	Attorney-client; work product
8/3/2007	A. Morningstar/ Forcon	J. Sipple K. Givens M. Trocke	E-mail re Auchter project documents	Work product
8/3/2007	L. Tilton/Forcon	M. Trocke C. Schnabel M. Sugar	E-mail re project costs	Work product
8/3/2007	A. Morningstar/ Forcon	J. Sipple K. Givens M. Trocke	E-mail re project documents	Attorney-client; work product
8/6/2007	N/A	N/A	Arch Loss and LAE Payment Form - legal fees paid to Shumaker, Loop & Kendrick, LLP	Attorney-client
8/7/2007	A. Morningstar/ Forcon	M. Trocke L. Tilton	E-mail re payment of claimants	Work product
8/7/2007	A. George, Esq.	M. Trocke, Esq.	E-mail re legal research project	Work product
8/7/2007	M. Trocke, Esq.	J. Sipple	E-mail with attached email to A. Morningstar from A. Franson (redacted version produced)	Work product
8/7/2007	M. Trocke, Esq.	J. Sipple	E-mail with attached email to M. Trocke from A. Franson (redacted version produced)	Work product
8/8/2007	L. Tilton/Forcon	M. Trocke, Esq.	E-mail re granite and trusses	Work product

2/29/2008

GOODBYS CREEK, LLC v. ARCH INSURANCE COMPANY  
ARCH'S PRIVILEGE LOG

DATE	AUTHOR	RECIPIENT(S)	DESCRIPTION	BASIS FOR CLAIM OF PRIVILEGE
8/8/2007	M. Sugar/ Forcon	A. Morningstar J. Sipple K. Givens	E-mail re Auchter project documents	Work product
8/8/2007	K. Givens	A. Morningstar M. Trocke, Esq.	E-mail re payment of claimants	Work product; attorney-client
8/8/2007	A. Morningstar/ Forcon	M. Trocke K. Givens	E-mail re payment of claimants	Work product
8/8/2007	A. Morningstar/ Forcon	M. Sugar J. Sipple K. Givens	E-mail re Auchter project documents	Work product
8/8/2007	J. Sipple/SLK	D. Dalaker, Esq.	E-mail re draft correspondence	Work product
8/8/2007	M. Trocke, Esq.	L. Tilton/Forcon K. Givens A. Morningstar	E-mail re inventory	Work product; attorney-client
8/8/2007	K. Givens	M. Trocke	E-mail re inventory	Attorney-client
8/8/2007	M. Trocke, Esq.	L. Tilton K. Givens A. Morningstar	E-mail re inventory	Work product; attorney-client
8/8/2007	L. Tilton/Forcon	K. Givens A. Morningstar M. Trocke	E-mail re inventory	Work product
8/8/2007	M. Trocke, Esq.	K. Givens B. Kuhn	E-mail re draft correspondence	Attorney-client
8/8/2007	A. Morningstar/ Forcon	M. Trocke, Esq.	E-mail re check status	Work product
8/8/2007	B. Kuhn/ Arch	M. Trocke, Esq.	E-mail re project costs	Attorney-client
8/8/2007	M. Trocke, Esq.	N/A	Draft correspondence to Goodbys Creek counsel	Work product
8/8/2007	A. Morningstar/ Forcon	M. Trocke, Esq.	E-mail re Cove invoices	Work product
8/8/2007	K. Givens	A. Morningstar M. Trocke, Esq.	E-mail re Cove invoices	Attorney-client; work product
8/8/2007	M. Trocke, Esq.	K. Givens A. Morningstar	E-mail re Cove inventory	Attorney-client; work product

2/29/2008

GOODBYS CREEK, LLC v. ARCH INSURANCE COMPANY  
ARCH'S PRIVILEGE LOG

DATE	AUTHOR	RECIPIENT(S)	DESCRIPTION	BASIS FOR CLAIM OF PRIVILEGE
8/8/2007	A. Morningslar/ Forcon	M. Trocke, Esq.	E-mail re check status	Work product
8/8/2007	K. Givens	A. Morningslar M. Trocke, Esq.	E-mail re Cove inventory	Attorney-client; work product
8/8/2007	RL Tilton	K. Givens A. Morningslar M. Trocke	E-mail re Cove inventory	Attorney-client; work product
8/8/2007	B. Kuhn	K. Givens	E-mail re draft correspondence from M. Trocke, Esq.	Attorney-client; work product
8/8/2007	K. Givens	B. Kuhn	E-mail re draft correspondence from M. Trocke, Esq.	Attorney-client; work product
8/8/2007	B. Kuhn	M. Trocke, Esq.	E-mail re Cove invoices	Attorney-client
8/8/2007	A. Morningslar/ Forcon	M. Trocke, Esq. K. Givens	E-mail re Cove invoices	Attorney-client; work product
8/9/2007	W. Clime/Forcon	M. Trocke, Esq.	E-mail re inventory	Work product
8/9/2007	M. Trocke, Esq.	J. Sipple	E-mail with attached email to M. McKee from M. Wilbanks (redacted version produced)	Work product
8/9/2007	N/A	N/A	Arch Loss and LAE Payment Form - fees paid to Forcon International Corp.	Work product
8/9/2007	W. Clime/Forcon	M. Trocke, Esq.	E-mail re Cove inventory	Work product
8/9/2007	K. Givens	B. Kuhn	E-mail re draft correspondence from M. Trocke, Esq.	Attorney-client; work product
8/9/2007	RL Tilton	M. Trocke, Esq. C. Schnabel K. Givens M. Iacobucci A. Morningslar	E-mail re Charleston Truss	Attorney-client; work product
8/13/2007	M. Sugar/ Forcon	A. Morningslar J. Sipple K. Givens	E-mail re Auchter project documents	Work product
8/13/2007	M. Trocke, Esq.	K. Givens	E-mail re building permits	Attorney-client
8/13/2007	K. Givens	M. Sugar	E-mail re project documents	Work product
8/14/2007	L. Tilton/Forcon	M. Trocke, Esq.	E-mail re inventory	Work product
8/14/2007	RL Tilton	C. Schnabel M. Trocke, Esq.	E-mail re Stark Truss	Attorney-client; work product

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GOODBYS CREEK, LLC v. ARCH INSURANCE COMPANY  
ARCH'S PRIVILEGE LOG

DATE	AUTHOR	RECIPIENT(S)	DESCRIPTION	BASIS FOR CLAIM OF PRIVILEGE
8/14/2007	RL Tilton	M. Trocke, Esq.	E-mail re Stark Truss	Work product
8/14/2007	RL Tilton	M. Trocke	E-mail re Silver Stream	Work product
8/14/2007	C. Schnabel/Forcon	RL Tilton M. Trocke, Esq.	E-mail re Stark Truss	Work product
8/14/2007	C. Schnabel/Forcon	RL Tilton M. Trocke, Esq.	E-mail re Silver Stream	Work product
8/14/2007	RL Tilton	C. Schnabel M. Trocke, Esq.	E-mail re Stark Truss	Work product
8/15/2007	M. Trocke, Esq.	C. Schnabel L. Tilton	E-mail re inventory	Work product
8/15/2007	M. Trocke, Esq.	L. Tilton C. Schnabel	E-mail re completion	Work product
8/15/2007	J. Sipple/SLK	K. Givens B. Kuhn	E-mail re correspondence from Goodbys Creek LLC	Attorney-client
8/15/2007	K. Hobolt/SLK	J. Sipple/SLK	E-mail re correspondence to Goodbys	Work product
8/15/2007	M. Trocke, Esq.	C. Schnabel	E-mail re Silver Stream	Work product
8/15/2007	B. Kuhn	K. Givens	E-mail re correspondence from M. Trocke, Esq.	Attorney-client; work product
8/17/2007	L. Tilton/Forcon	M. Trocke, Esq.	E-mail re inventory	Work product
8/17/2007	B. Bethel/SLK	J. Sipple/SLK	E-mail re receipt of correspondence	Work product
8/20/2007	M. Trocke, Esq.	B. Kuhn, Esq.	E-mail re correspondence from Goodbys Creek LLC	Attorney-client
8/20/2007	J. Sipple/SLK	L. Tilton/Forcon	E-mail re correspondence from Goodbys Creek LLC	Work product
8/20/2007	M. Trocke, Esq.	J. Sipple	E-mail with attached email to M. Trocke from K. McCue (redacted version produced)	Work product
8/20/2007	M. Trocke, Esq.	B. Kuhn	E-mail re correspondence with Cranford	Attorney-client
8/20/2007	B. Kuhn	M. Trocke, Esq.	E-mail re meeting schedule	Attorney-client
8/22/2007	L. Tilton/Forcon	M. Trocke, Esq.	E-mail re Stark Truss	Work product
8/23/2007	M. Trocke, Esq.	L. Tilton/Forcon	E-mail re completion	Work product
8/23/2007	M. Trocke, Esq.	RL Tilton	E-mail re correspondence with Goodbys	Work product
8/27/2007	M. Trocke, Esq.	L. Tilton	E-mail with attached email to L. Tilton from M. Redmon (redacted version produced)	Work product
8/27/2007	M. Trocke, Esq.	RL Tilton	E-mail re payment of subcontractors and suppliers	Work product
8/28/2007	A. Morningstar/Forcon	K. Givens M. Trocke, Esq.	E-mail re purchase orders	Work product

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 GOODBYS CREEK, LLC v. ARCH INSURANCE COMPANY  
 ARCH'S PRIVILEGE LOG

DATE	AUTHOR	RECIPIENT(S)	DESCRIPTION	BASIS FOR CLAIM OF PRIVILEGE
8/28/2007	A. Morningstar/ Forcon	M. Trocke, Esq.	E-mail re inventory	Work product
8/28/2007	A. Morningstar/ Forcon	K. Givens M. Trocke, Esq.	E-mail re Cove invoices	Attorney-client; work product
8/28/2007	K. Givens	M. Trocke, Esq.	E-mail re meeting schedule	Attorney-client
8/28/2007	A. Morningstar/ Forcon	J. Sipple	E-mail re payments to suppliers and subcontractors	Work product
8/29/2007	M. Trocke, Esq.	K. Givens	Fax re project	Attorney-client
8/29/2007	M. Trocke, Esq.	K. Givens B. Kuhn	E-mail re meeting schedule	Attorney-client
8/29/2007	J. Sipple/SLK	S. Schember, Esq.	E-mail re meeting schedule	Work product
8/29/2007	J. Sipple/SLK	C. Schnabel	E-mail re inventory	Work product
8/29/2007	M. Trocke, Esq.	J. Sipple	E-mail with attached email to M. Trocke from S. Levine (redacted version produced)	Work product
8/29/2007	D. Daiker, Esq.	K. Givens M. Trocke, Esq. B. Kuhn	E-mail re meeting schedule	Attorney-client
8/29/2007	K. Givens	M. Trocke B. Kuhn	E-mail re meeting schedule	Attorney-client
8/29/2007	K. Givens	D. Daiker, Esq. M. Trocke, Esq. B. Kuhn	E-mail re meeting schedule	Attorney-client
8/29/2007	M. Sugar/Forcon	K. Givens	E-mail re meeting schedule	Work product
8/29/2007	K. Givens	M. Sugar	E-mail re meeting schedule	Work product
8/30/2007	M. Trocke, Esq.	A. Morningstar/ Forcon	E-mail re draft correspondence	Work product
8/30/2007	A. Morningstar/ Forcon	M. Trocke	E-mail re trusses	Work product
8/30/2007	A. Morningstar/ Forcon	J. Sipple	E-mail re releases and assignment	Work product
8/30/2007	A. Morningstar/ Forcon	J. Sipple	E-mail re Arch payments	Work product
8/30/2007	A. Morningstar/ Forcon	M. Trocke, Esq.	E-mail re J. Beach release	Work product
8/30/2007	J. Sipple/SLK	D. Daiker, Esq.	E-mail re meeting agenda	Work product

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GOODBYS CREEK, LLC v. ARCH INSURANCE COMPANY  
ARCH'S PRIVILEGE LOG

DATE	AUTHOR	RECIPIENT(S)	DESCRIPTION	BASIS FOR CLAIM OF PRIVILEGE
8/30/2007	J. Sipple/SLK	D. Dalkner, Esq.	E-mail re draft correspondence	Work product
8/31/2007	M. Trocke, Esq.	K. Givens	E-mail re meeting agenda	Attorney-client
8/31/2007	J. Sipple/SLK	M. Trocke, Esq.	E-mail re meeting agenda	Work product
8/31/2007	D. Dalkner, Esq.	J. Sipple	E-mail re draft correspondence	Work product
8/31/2007	K. Givens	M. Trocke, Esq.	E-mail re meeting schedule	Attorney-client
9/4/2007	M. Trocke, Esq.	C. Schnabel L. Tilton A. Morningslar	E-mail re budget summary	Work product
9/4/2007	M. Trocke, Esq.	J. Sipple	E-mail with attached email to M. Trocke from S. Levine (redacted version produced)	Work product
9/4/2007	M. Trocke, Esq.	J. Sipple	E-mail with attached email to S. Levine from M. Trocke (redacted version produced)	Work product
9/5/2007	M. Trocke, Esq.	D. Dalkner, Esq.	E-mail re draft correspondence	Work product
9/5/2007	M. Trocke, Esq.	K. Givens B. Kuhn	E-mail re draft correspondence	Attorney-client
9/5/2007	M. Trocke	N/A	Draft correspondence to Goodbys Creek counsel	Work product
9/6/2007	K. Givens	M. Trocke, Esq.	E-mail re draft correspondence	Attorney-client
9/6/2007	A. Morningslar/ Forcon	M. Sugar M. Trocke, Esq.	E-mail re work suspension	Work product
9/6/2007	B. Kuhn	K. Givens	E-mail re schedule	Work product
9/7/2007	J. Sipple/SLK	D. Dalkner, Esq.	E-mail re draft correspondence	Work product
9/10/2007	D. Dalkner, Esq.	J. Sipple	E-mail re draft correspondence	Work product
9/10/2007	M. Trocke, Esq.	M. Sugar	Letter re Forcon investigation	Work product
9/10/2007	M. Trocke, Esq.	M. Sugar	E-mail re project issues	Work product
9/12/2007	M. Trocke, Esq.	D. Dalkner, Esq.	Memorandum regarding legal research	Work product
9/12/2007	N/A	N/A	Arch Loss and LAE Payment Form - legal fees paid to Shumaker, Loop & Kendrick, LLP	Attorney-client
9/12/2007	N/A	N/A	Arch Loss and LAE Payment Form - legal fees paid to Shumaker, Loop & Kendrick, LLP	Attorney-client
9/12/2007	N/A	N/A	Arch Loss and LAE Payment Form - legal fees paid to Foley & Lardner, LLP	Attorney-client
9/12/2007	K. Givens	C. Diebel	E-mail re Escrow Agreement	Work product



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GOODBYS CREEK, LLC v. ARCH INSURANCE COMPANY  
ARCH'S PRIVILEGE LOG

DATE	AUTHOR	RECIPIENT(S)	DESCRIPTION	BASIS FOR CLAIM OF PRIVILEGE
9/13/2007	W. Clime/Forcon	M. Trocke K. Givens C. Schnabel A. Morningstar	E-mail re change orders	Work product
9/13/2007	J. Sipple/SLK	D. Dalkar, Esq.	E-mail re draft correspondence	Work product
9/13/2007	D. Dalkar, Esq.	J. Sipple	E-mail re draft correspondence	Work product
9/13/2007	W. Clime/Forcon	M. Trocke, Esq. K. Givens C. Schnabel A. Morningstar	E-mail re change orders	Work product
9/13/2007	N/A	N/A	Arch Loss and LAE Payment Form - fees paid to Forcon International Corp.	Work product
9/13/2007	R.L. Tilton/Forcon	M. Trocke, Esq.	Letter re pending change orders	Work product
9/14/2007	M. Trocke, Esq.	K. Givens B. Kuhn	Letter re Goodbys corporate matters	Attorney-client
9/14/2007	L. Tilton/Forcon	M. Trocke, Esq. J. Sipple	E-mail re change orders	Work product
9/17/2007	M. Trocke, Esq.	L. Tilton	E-mail re change orders	Work product
9/17/2007	K. Givens	J. Sipple	E-mail re meeting schedule	Attorney-client
9/17/2007	M. Trocke, Esq.	K. Givens	E-mail re meeting schedule	Attorney-client
9/17/2007	D. Dalkar, Esq.	M. Trocke, Esq.	E-mail re meeting schedule	Work product
9/17/2007	J. Sipple	K. Givens	E-mail re meeting schedule	Attorney-client
9/17/2007	M. Trocke, Esq.	K. Givens	E-mail re meeting schedule	Attorney-client
9/17/2007	K. Givens	M. Trocke, Esq.	E-mail re meeting schedule	Attorney-client
9/18/2007	K. Givens	D. Dalkar, Esq.	E-mail re meeting schedule	Attorney-client
9/18/2007	D. Dalkar, Esq.	M. Trocke, Esq. K. Givens	E-mail re meeting schedule	Attorney-client; work product
9/19/2007	M. Trocke, Esq.	K. Givens	E-mail re correspondence from Goodbys Creek LLC	Attorney-client
9/19/2007	L. Tilton/Forcon	M. Trocke, Esq.	E-mail re meeting schedule	Work product
9/19/2007	D. Dalkar, Esq.	J. Sipple K. Givens M. Trocke	E-mail with attached email to S. Levine from M. Trocke (redacted version produced)	Work product; attorney-client
9/19/2007	M. Trocke, Esq.	J. Sipple	E-mail with attached email to M. Trocke from S. Noell (redacted version produced)	Work product

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GOODBYS CREEK, LLC v. ARCH INSURANCE COMPANY  
ARCH'S PRIVILEGE LOG

DATE	AUTHOR	RECIPIENT(S)	DESCRIPTION	BASIS FOR CLAIM OF PRIVILEGE
9/19/2007	K. Givens	D. Daiker, Esq. M. Trocke, Esq.	E-mail re meeting schedule	Attorney-client
9/24/2007	D. Daiker, Esq.	K. Givens M. Trocke, Esq.	E-mail re meeting schedule	Attorney-client
9/24/2007	K. Givens	M. Trocke, Esq. D. Daiker, Esq.	E-mail re meeting schedule	Attorney-client
9/24/2007	D. Daiker, Esq.	K. Givens	E-mail re meeting schedule	Attorney-client
9/24/2007	J. Sipple/SLK	D. Daiker, Esq.	E-mail re draft correspondence	Work product
9/24/2007	D. Daiker, Esq.	J. Sipple	E-mail re draft correspondence	Work product
9/24/2007	K. Givens	M. Trocke, Esq. D. Daiker, Esq.	E-mail re meeting schedule	Attorney-client
9/24/2007	M. Trocke, Esq.	J. Sipple	E-mail with attached email to M. Trocke from S. Novell (redacted version produced)	Work product
9/24/2007	K. Givens	D. Daiker, Esq. M. Trocke, Esq.	E-mail re meeting schedule	Attorney-client
9/24/2007	M. Trocke, Esq.	K. Givens D. Daiker, Esq.	E-mail re meeting schedule	Attorney-client; work product
9/25/2007	M. Trocke, Esq.	K. Givens	E-mail re correspondence from Goodbys Creek LLC	Attorney-client
9/25/2007	K. Givens	M. Trocke, Esq. D. Daiker, Esq.	E-mail re meeting schedule	Attorney-client
9/25/2007	K. Givens	M. Trocke, Esq.	E-mail re draft correspondence	Attorney-client
9/25/2007	M. Trocke, Esq.	C. Schnabel L. Tilton A. Morningstar	E-mail re meeting with obligee	Work product
9/25/2007	K. Givens	M. Trocke, Esq. D. Daiker, Esq.	E-mail with attached e-mail to M. Trocke from S. Novell (redacted version produced)	Work product; attorney-client
9/25/2007	K. Givens	M. Trocke, Esq. D. Daiker, Esq.	E-mail re meeting schedule	Attorney-client
9/25/2007	M. Trocke, Esq.	K. Givens	E-mail re response to correspondence	Attorney-client
9/25/2007	K. Givens	M. Trocke, Esq.	E-mail re response to correspondence	Attorney-client

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GOODBYS CREEK, LLC v. ARCH INSURANCE COMPANY  
ARCH'S PRIVILEGE LOG

DATE	AUTHOR	RECIPIENT(S)	DESCRIPTION	BASIS FOR CLAIM OF PRIVILEGE
9/25/2007	M. Trocke, Esq.	C. Schnabel RL Tilton A. Morningslar	E-mail re change orders	Work product
9/26/2007	K. Givens	B. Kuhn	E-mail re meeting schedule	Work product
9/26/2007	A. Morningslar/ Forcon	M. Trocke, Esq. C. Schnabel RL Tilton	E-mail re change orders	Work product
9/28/2007	C. Diabel	K. Givens	E-mail re unit owner releases	Work product
10/1/2007	L. Tilton/Forcon	A. Morningslar C. Schnabel M. Trocke, Esq.	E-mail re meeting schedule	Work product
10/1/2007	L. Tilton/Forcon	A. Morningslar C. Schnabel M. Trocke, Esq.	E-mail re meeting schedule	Work product
10/2/2007	M. Trocke, Esq.	K. Givens	E-mail re correspondence from Goodbys Creek LLC	Attorney-client
10/2/2007	J. Sipple/SLK	D. Daiker, Esq.	E-mail re draft correspondence	Work product
10/2/2007	M. Trocke, Esq.	J. Sipple	E-mail with attached email to M. Trocke from C. Cranford (redacted version produced)	Work product
10/4/2007	A. Morningslar/ Forcon	S. Schnabel L. Tilton	E-mail re payment of claimants	Work product
10/4/2007	A. Morningslar/ Forcon	M. Trocke, Esq.	E-mail re assignment of claim	Work product
10/5/2007	M. Trocke, Esq.	K. Givens	E-mail re correspondence with counsel	Attorney-client
10/5/2007	M. Sugar/ Forcon	M. Iacobucci K. Givens D. Daiker, Esq. M. Trocke, Esq.	E-mail re releases	Work product
10/8/2007	D. Daiker, Esq.	J. Sipple	E-mail re meeting schedule	Work product
10/8/2007	M. Trocke, Esq.	K. Givens	E-mail re meeting schedule	Attorney-client
10/8/2007	D. Daiker, Esq.	M. Trocke, Esq. K. Givens	E-mail with attached email to M. Trocke from S. Novell (redacted version produced)	Work product; attorney-client
10/8/2007	N/A	N/A	Arch Loss and LAE Payment Form - fees paid to Forcon International Corp.	Work product

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GOODBYS CREEK, LLC v. ARCH INSURANCE COMPANY  
ARCH'S PRIVILEGE LOG

DATE	AUTHOR	RECIPIENT(S)	DESCRIPTION	BASIS FOR CLAIM OF PRIVILEGE
10/8/2007	M. Trocke, Esq.	K. Givens D. Dalaker, Esq.	E-mail re meeting schedule	Attorney-client; work product
10/9/2007	N/A	N/A	Arch Loss and LAE Payment Form - legal fees paid to Shumaker, Loop & Kendrick, LLP	Attorney-client
10/9/2007	B. Kuhn	M. Trocke, Esq. D. Dalaker, Esq.	E-mail re draft correspondence to Goodbys counsel	Attorney-client
10/10/2007	M. Trocke, Esq.	B. Kuhn, Esq.	E-mail re inventory	Attorney-client
10/10/2007	B. Lambert, Esq.	M. Trocke, Esq.	E-mail re legal research project	Work product
10/10/2007	M. Trocke	B. Kuhn	E-mail re correspondence with Goodbys	Attorney-client
10/11/2007	B. Kuhn/ Arch	J. Sipple	E-mail re correspondence	Attorney-client
10/11/2007	J. Sipple/SLK	D. Dalaker, Esq.	E-mail re draft correspondence	Work product
10/11/2007	J. Sipple/SLK	B. Kuhn	E-mail re correspondence	Attorney-client
10/11/2007	K. Givens	B. Kuhn	E-mail re correspondence to Goodbys	Attorney-client; work product
10/11/2007	K. Givens	D. Dalaker	E-mail re litigation	Attorney-client
10/12/2007	D. Dalaker, Esq.	K. Givens	E-mail re meeting schedule	Attorney-client
10/12/2007	D. Dalaker, Esq.	K. Givens	E-mail re meeting schedule	Attorney-client
10/12/2007	K. Givens	D. Dalaker, Esq.	E-mail re meeting schedule	Attorney-client
10/12/2007	D. Dalaker, Esq.	K. Givens	E-mail re meeting schedule	Attorney-client
10/15/2007	M. Trocke, Esq.	J. Sipple	E-mail with attached email to M. Trocke from S. Levine (redacted version produced)	Work product
10/16/2007	D. Dalaker, Esq.	K. Givens B. Kuhn	E-mail re litigation	Attorney-client
10/17/2007	M. Streatman, Esq.	C. Diebel	E-mail re assignment of claim	Attorney-client
10/17/2007	M. Streatman, Esq.	C. Diebel	E-mail re assignment	Attorney-client
10/17/2007	D. Dalaker, Esq.	K. Givens C. Schnabel	Fax coversheet	Attorney-client
10/17/2007	M. Streatman, Esq.	C. Diebel	E-mail re litigation	Attorney-client
10/19/2007	D. Dalaker, Esq.	K. Givens B. Kuhn	E-mail re litigation	Attorney-client
10/23/2007	C. Diebel	M. Streatman, Esq.	Letter re assignment	Attorney-client
10/23/2007	D. Dalaker, Esq.	K. Givens B. Kuhn	E-mail re litigation	Attorney-client

2/29/2008

GOODBYS CREEK, LLC v. ARCH INSURANCE COMPANY  
ARCH'S PRIVILEGE LOG

DATE	AUTHOR	RECIPIENT(S)	DESCRIPTION	BASIS FOR CLAIM OF PRIVILEGE
10/23/2007	D. Daiker, Esq.	B. Kuhn	E-mail re inventory	Attorney-client
10/24/2007	M. Trocke, Esq.	D. Daiker, Esq. S. Schember, Esq.	E-mail re claim of lien	Work product
10/24/2007	S. Schember, Esq.	M. Trocke, Esq. D. Daiker, Esq.	E-mail re claim of lien	Work product
10/24/2007	K. Givens	B. Kuhn	E-mail re contest of lien	Work product
10/25/2007	J. Sipple/SLK	D. Daiker, Esq.	E-mail re draft correspondence	Work product
10/29/2007	D. Daiker, Esq.	J. Sipple	E-mail re correspondence to Levine	Work product
10/29/2007	B. Lambert, Esq.	S. Schember, Esq.	E-mail re legal research project	Work product
10/29/2007	M. Trocke, Esq.	K. Givens	E-mail re claim of lien	Attorney-client
10/29/2007	M. Trocke, Esq.	B. Kuhn, Esq.	Letter re payment of claimants	Attorney-client
10/29/2007	M. Trocke	B. Kuhn	E-mail re correspondence with S. Levine	Attorney-client
10/29/2007	B. Kuhn	K. Givens	E-mail re draft correspondence from D. Daiker, Esq.	Attorney-client; work product
10/30/2007	K. Givens	M. Trocke, Esq. D. Daiker, Esq.	E-mail re Escrow Agreement	Attorney-client
10/31/2007	M. Streehnman, Esq.	K. Givens B. Kuhn	E-mail re assignment of claim	Attorney-client
10/31/2007	B. Kuhn	K. Givens	E-mail re litigation	Work product
10/31/2007	K. Givens	B. Kuhn	E-mail re claim summary prepared by Forcon	Work product
10/31/2007	K. Givens	D. Daiker, Esq.	E-mail re litigation	Attorney-client
10/31/2007	A. Morningstar/ Forcon	M. Iacobucci K. Givens	E-mail re Silver Stream	Work product
10/31/2007	C. Diebel	K. Givens	E-mail re consulting agreement	Work product
11/1/2007	M. Streehnman, Esq.	K. Givens D. Daiker	E-mail re lien	Attorney-client; work product
11/1/2007	K. Givens	D. Daiker, Esq.	E-mail re litigation	Attorney-client
11/1/2007	D. Daiker, Esq.	K. Givens	E-mail re litigation	Attorney-client
11/2/2007	N/A	N/A	Arch Loss and LAE Payment Form - legal fees paid to Shumaker, Loop & Kendrick, LLP	Attorney-client
11/2/2007	A. Morningstar/ Forcon	RL Tilton	E-mail re inventory	Work product
11/5/2007	M. Trocke, Esq.	A. Morningstar	E-mail re inventory	Work product

2/29/2008

GOODBYS CREEK, LLC v. ARCH INSURANCE COMPANY  
ARCH'S PRIVILEGE LOG

DATE	AUTHOR	RECIPIENT(S)	DESCRIPTION	BASIS FOR CLAIM OF PRIVILEGE
11/17/2007	M. Trocke, Esq.	K. Givens	E-mail re Silver Stream	Attorney-client
11/17/2007	K. Givens	M. Trocke, Esq. D. Dalkner, Esq.	E-mail re Silver Stream	Attorney-client
11/17/2007	K. Givens	M. Trocke, Esq. D. Dalkner, Esq.	E-mail re Silver Stream	Attorney-client
11/9/2007	C. Diebel	K. Givens	E-mail re unit owner releases	Work product
11/12/2007	D. Dalkner, Esq.	K. Givens B. Kuhn	E-mail re litigation	Attorney-client
11/12/2007	B. Kuhn/ Arch	D. Dalkner, Esq. K. Givens	E-mail re litigation	Attorney-client
11/12/2007	K. Givens	D. Dalkner, Esq. K. Givens	E-mail re litigation	Attorney-client
11/12/2007	D. Dalkner, Esq.	K. Givens B. Kuhn	E-mail re litigation	Attorney-client
11/12/2007	K. Givens	C. Diebel	E-mail re Cove project	Work product
11/12/2007	C. Diebel	K. Givens	E-mail re payments to suppliers and subcontractors	Work product
11/12/2007	C. Diebel	K. Givens	E-mail re telephone conference	Work product
11/13/2007	K. Givens	C. Diebel	E-mail re telephone conference	Work product
11/14/2007	S. Traub, Esq.	K. Givens B. Kuhn	E-mail re draft pleadings	Attorney-client
11/14/2007	D. Dalkner, Esq.	B. Kuhn	E-mail re litigation	Attorney-client
11/14/2007	K. Givens	S. Traub, Esq. B. Kuhn	E-mail re litigation	Attorney-client
11/14/2007	B. Kuhn/ Arch	P. Nails/Arch	E-mail re review of pleadings in litigation	Work product
11/15/2007	D. Dalkner, Esq.	K. Givens B. Kuhn	Fax with copies of pleadings	Work product
11/21/2007	K. Givens	B. Kuhn	E-mail re preparation of pleadings	Work product
11/21/2007	M. Trocke, Esq.	C. Diebel	E-mail re preparation of pleadings	Work product; attorney-client
11/21/2007	C. Diebel	M. Trocke, Esq. S. Traub, Esq.	E-mail re preparation of pleadings	Work product; attorney-client

2/29/2008

GOODBYS CREEK, LLC v. ARCH INSURANCE COMPANY  
ARCH'S PRIVILEGE LOG

DATE	AUTHOR	RECIPIENT(S)	DESCRIPTION	BASIS FOR CLAIM OF PRIVILEGE
11/21/2007	C. Diebel	A. Morningslar M. Trocke, Esq. S. Traub, Esq.	E-mail re preparation of pleadings	Attorney-client
11/26/2007	J. Caven, Esq.	K. Givens C. Diebel W. Glass	E-mail re Cove construction matters	Attorney-client
11/26/2007	K. Givens	J. Caven, Esq. C. Diebel W. Glass	E-mail re Cove construction matters	Attorney-client
11/26/2007	J. Caven, Esq.	J. Caven, Esq. K. Givens C. Diebel W. Glass	E-mail re Cove construction matters	Attorney-client
11/28/2007	A. Morningslar/ Forcon	K. Givens	E-mail re Escrow Agreement	Work product
11/28/2007	A. Morningslar/ Forcon	S. Traub, Esq. C. Diebel	E-mail re preparation of affidavit	Work product
11/28/2007	C. Diebel	K. Givens	E-mail re unit owner releases	Work product
11/30/2007	A. Morningslar/ Forcon	K. Givens	E-mail re Escrow Agreement	Work product
11/30/2007	K. Givens	M. Trocke, Esq.	E-mail re Escrow Agreement	Attorney-client
11/30/2007	K. Givens	C. Diebel A. Morningslar	E-mail re Escrow Agreement	Work product
12/5/2007	N/A	N/A	Arch Loss and LAE Payment Form - legal fees paid to Shumaker, Loop & Kendrick, LLP	Attorney-client
12/5/2007	N/A	N/A	Arch Loss and LAE Payment Form - legal fees paid to Shumaker, Loop & Kendrick, LLP	Attorney-client
12/5/2007	N/A	N/A	Arch Loss and LAE Payment Form - fees paid to Forcon International Corp.	Work product
12/6/2007	M. Streetman, Esq.	C. Diebel	E-mail re project liens	Attorney-client
12/6/2007	M. Streetman, Esq.	K. Givens	E-mail re project liens	Attorney-client
12/6/2007	K. Givens	J. Caven, Esq.	E-mail re Escrow Agreement	Attorney-client
12/6/2007	M. Streetman, Esq.	C. Diebel	E-mail re claim filed by Hal Jones Contractor	Attorney-client
12/6/2007	M. Streetman, Esq.	K. Givens	E-mail re claim filed by Hal Jones Contractor	Attorney-client
12/6/2007	K. Givens	M. Streetman, Esq.	E-mail re claim filed by Hal Jones Contractor	Attorney-client

2/29/2008

GOODEYS CREEK, LLC v. ARCH INSURANCE COMPANY  
ARCH'S PRIVILEGE LOG

DATE	AUTHOR	RECIPIENT(S)	DESCRIPTION	BASIS FOR CLAIM OF PRIVILEGE
12/27/2007	C. Diebel	M. Trocke, Esq., M. Sugar, K. Givens, M. Iacobucci, C. Schrabel, A. Morningstar, D. Daiker, Esq., S. Traub, Esq.	E-mail re financial recap of project	Attorney-client; work product
12/11/2007	J. Caven, Esq.	M. Trocke, Esq. K. Givens	E-mail re unit owner releases	Attorney-client; work product
12/14/2007	S. Traub, Esq.	C. Diebel	E-mail re preparation of affidavit	Attorney-client
12/19/2007	J. Caven, Esq.	M. Trocke, Esq.	E-mail re unit owner releases	Work product
12/20/2007	N/A	N/A	Arch Loss and LAE Payment Form - fees paid to Forcon International Corp.	Work product
12/27/2007	N/A	N/A	Arch - Check register; payments to consultants	Work product
1/7/2008	K. Givens	S. Traub, Esq.	E-mail re litigation	Attorney-client
1/10/2008	C. Diebel	K. Givens	E-mail re unit owner releases	Work product
1/11/2008	N/A	N/A	Arch Loss and LAE Payment Form - legal fees paid to Shutmaker, Loop & Kendrick, LLP	Attorney-client
1/11/2008	N/A	N/A	Arch Loss and LAE Payment Form - legal fees paid to Shutmaker, Loop & Kendrick, LLP	Attorney-client
1/11/2008	N/A	N/A	Arch Loss and LAE Payment Form - legal fees paid to Foley & Lardner, LLP	Attorney-client
1/14/2008	K. Givens	C. Diebel	E-mail re unit owner releases	Work product
1/15/2008	N/A	N/A	Arch Loss and LAE Payment Form - fees paid to Forcon International Corp.	Work product
1/16/2008	D. Low/Auchter	A. Morningstar	E-mail re Stark Truss	Work product
1/16/2008	A. Morningstar/Forcon	D. Low	E-mail re Stark Truss	Work product
1/31/2008	J. Caven, Esq.	K. Givens	E-mail re litigation	Attorney-client
1/31/2008	K. Givens	J. Caven, Esq.	E-mail re litigation	Attorney-client
2/5/2008	J. Caven, Esq.	K. Givens	E-mail re litigation	Attorney-client
2/5/2008	K. Givens	J. Caven, Esq.	E-mail re litigation	Attorney-client
2/12/2008	B. Kuhn/ Arch	K. Givens	Memorandum regarding project analysis	Work product
Undated	Forcon International Corp.	N/A	Spreadsheets re project pay applications	Work product



2/29/2008

GOODBYS CREEK, LLC v. ARCH INSURANCE COMPANY  
ARCH'S PRIVILEGE LOG

DATE	AUTHOR	RECIPIENT(S)	DESCRIPTION	BASIS FOR CLAIM OF PRIVILEGE
Undated	N/A	N/A	Portion of Auchler contract with handwritten notes	Work product
Undated	N/A	N/A	Portion of Auchler contract with handwritten notes	Work product
Undated	SLK	N/A	Memorandum re agenda issues for meeting with The Cove	Work product
Various	N/A	N/A	Arch Insurance electronic receipts for e-mails received from Shumaker, Loop & Kendrick, LLP	Attorney-client

WALTERS  
LEVINE  
KLINGENSMITH  
& THOMISON P.A.  
ATTORNEYS AT LAW  
SARASOTA • TAMPA

THE BANK OF TAMPA BUILDING  
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(813) 254-7474  
(813) 254-7341 FAX

STUART JAY LEVINE

slevine@walterslevine.com  
www.walterslevine.com

June 5, 2008

VIA ELECTRONIC MAIL ddaiker@skl-law.com

Duane A. Daiker, Esquire  
Shumaker, Loops & Kendrick, LLP  
101 East Kennedy Blvd., Ste. 2800  
Tampa, FL 33672

Re: Goodbys Creek v. Arch Insurance Company

Dear Mr. Daiker:

Please allow this letter to serve as a good faith effort to resolve a discovery dispute in accordance with Middle District Rule 3.01(g).

Arch has produced limited, if any, documents responsive to paragraphs 2, 5, 8, 9, 11, 12 and 13 to Plaintiff's First request for Production of documents. No objections were asserted as to paragraphs 2, 5, 8, 9 or 13.

With respect paragraphs 11 and 12, the documents requested are clearly likely to lead to the discovery of admissible evidence. Arch's knowledge of the solvency of Auchter will demonstrate that Arch's continued and unauthorized demands on Goodby's to provide evidence of its financial ability was merely a ruse.

Please let me know whether the documents requested will be produced.

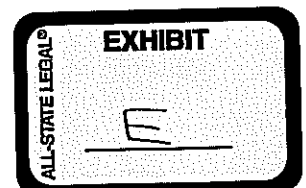
Very truly yours,

WALTERS LEVINE  
KLINGENSMITH & THOMSON, P.A.

Stuart Jay Levine

SJL/sn

cc: Steven G. Schember, Esquire



**Stuart J. Levine**

---

**From:** Daiker, Duane A. [ddaiker@slk-law.com]  
**Sent:** Tuesday, June 10, 2008 4:31 PM  
**To:** Stuart J. Levine  
**Cc:** Chip Cranford; Schember, Steven G.; Traub, Seth; Holmer, Kathy  
**Subject:** RE: Arch Documents

Stuart,

We will not produce communications between Arch and Auchter that do not relate to the project at issue. In reviewing our response to your request to produce, that may not have been clear. We will amend shortly to show our objection to producing communications unrelated to the project. In essence then, we have produced the communications we intend to produce on that request.

We will stand by our objections to Request 11 and 12. The continuing financial viability of Auchter has absolutely no bearing on this case. There was a fully solvent surety standing behind Auchter, and Auchter never failed in its contractual obligations. There is simply no relevance to the information you are seeking, and regardless of what you say "Goodby's contentions" might now be, such contentions are not reasonably framed by the pleadings in this case. The issue at trial, as framed by the pleadings, will be whether Goodbys defaulted on its obligations to provide financial assurances pursuant to the contract.

Thanks.

Duane A. Daiker  
Attorney at Law, Board Certified Appellate Specialist Shumaker, Loop & Kendrick, LLP Bank of America Plaza  
101 East Kennedy Boulevard  
Suite 2800  
Tampa, FL 33602  
813.229.7600  
813.227.2329 direct  
813.229.1660 fax  
ddaiker@slk-law.com  
<http://www.slk-law.com/>

-----  
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-----Original Message-----

**From:** Stuart J. Levine [mailto:slevine@WaltersLevine.com]  
**Sent:** Monday, June 09, 2008 2:08 PM  
**To:** Daiker, Duane A.  
**Cc:** Chip Cranford  
**Subject:** Arch Documents  
**Importance:** High

Duane:

I sent you a letter on June 5, 2008 regarding the records which Arch has not produced. I am particularly interested in all communications Between Arch and Auchter starting in 2006 with respect to Auchter's defaults on this and any other project on which Auchter defaulted.



As you know, it is Goodby's contention in this case that Auchter was having financial difficulties as early as May of 2006 and Arch was fully aware of these problems. In fact, discovery has revealed that as early as October of 2006, Arch was requiring all of Auchter's subcontractor's on this Goodby's project to enter into Payment and Escrow Agreements to ensure the subcontractor's were paid.

Not only did Auchter and Arch fail to disclose these significant financial problems of Auchter, as importantly, Auchter and Arch wrongfully terminated the contract and Arch wrongfully refused to perform under the terms of the Performance Bond under the pretense that Arch was concerned about Goodby's finances. However, all along, Arch knew that even if paid, Auchter was going to be unable to continue the performance of the contract.

These among other obvious reasons make the production of records in response to paragraphs 11 and 12 of the Request to Produce reasonably calculated to lead to the discovery of admissible evidence. If I do not from you by tomorrow, I will assume you will stand by the objections raised and we will be filing a Motion to Compel.

Regards,  
Stuart

\*\*\*\*\*  
\*\*\*\*\*

Stuart Jay Levine, Esquire

Walters Levine Klingensmith & Thomison, P.A.

601 Bayshore Blvd., Ste. 720

Tampa, Fl 33606

Phone: (813) 254-7474

\*\*\*\*\*  
\*\*\*\*\*

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**Sheri Novell**

---

**From:** Daiker, Duane A. [ddaiker@slk-law.com]  
**Sent:** Friday, May 09, 2008 3:21 PM  
**To:** Stuart J. Levine; Holmer, Kathy  
**Cc:** Schember, Steven G.; Traub, Seth; Sheri Novell  
**Subject:** RE: Goodbys v. Arch - Arch Insurance Document Production

Stuart,

We just received the images and the bill from the copy company for the "hard" documents you reviewed here at our office. The cost of imaging (.14 per page) and Bates labeling (.01 per page) for 11,597 pages burned to a DVD (\$40) was \$1,779.55. We will split this cost with you (50/50) and provide you with all the .tiff images on DVD for \$889.77. We also printed the Arch file documents you requested, at a price of .07 per page for 2,909 pages, for a total of \$203.63. So, your total for those documents is \$1,093.40.

The DVD and the blowbacks can be ready to be exchanged for payment whenever you desire. Please make the check payable to my firm.

As for the other documents that only exist in electronic format, we previously offered them to you as .tiff files. There are a total of 13,282 .tiff files to be transferred, at a cost of \$.06/image, for a total of \$796.92. Again, this represents only half the cost of actually having these documents imaged.

You had also asked about getting the documents in their native file format, instead of .tif images. I have some concerns about doing that. First, I don't believe that you are necessarily entitled to the native format. Rule 34, Fed. R. Civ. P. permits me to produce documents in a reasonably usable form if your request does not specify a particular form, which it does not. Although this whole area is relatively new, some courts have found that getting the documents in native format requires a showing of particular relevance—like the need to extract metadata, etc.

My bigger concern, however, is document management. If I give you hundreds or thousands of e-mails and Word documents in native format, without any Bates labelling, how will be ever be able to identify or refer to those documents? I think it spells major document management headaches. Things are much easier when we can all refer to a Bates number to identify a document. I am open to your thoughts on that issue.

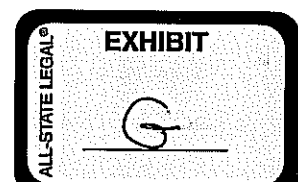
Let me further ask... I have reviewed the documents in Jacksonville. I need to come to your office and review the rest. How much are you producing in the way of electronic documents, and in what format are you producing them to us?

Please give me some dates and times that I can come to your office to view the remainder of your production, and an estimate as to the quantity.

Thanks.

**Duane A. Daiker**  
*Attorney at Law, Board Certified Appellate Specialist*  
**Shumaker, Loop & Kendrick, LLP**  
Bank of America Plaza  
101 East Kennedy Boulevard  
Suite 2800  
Tampa, FL 33602  
813.229.7600  
813.227.2329 direct  
813.229.1660 fax  
ddaiker@slk-law.com  
[www.slk-law.com](http://www.slk-law.com)

7/2/2008



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**From:** Stuart J. Levine [mailto:slevine@WaltersLevine.com]  
**Sent:** Friday, May 09, 2008 11:00 AM  
**To:** Holmer, Kathy  
**Cc:** Schember, Steven G.; Dalker, Duane A.; Traub, Seth; Sheri Novell  
**Subject:** RE: Goodbys v. Arch - Arch Insurance Document Production

Where are the documents we requested?  
 Where is the electronic version of the e-mails?

\*\*\*\*\*  
 Stuart Jay Levine, Esquire  
 Walters Levine Klingensmith & Thomison, P.A.  
 601 Bayshore Blvd., Ste. 720  
 Tampa, FL 33606  
 Phone: (813) 254-7474  
 \*\*\*\*\*

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**From:** Holmer, Kathy [mailto:kholmer@slk-law.com]  
**Sent:** Thursday, April 24, 2008 9:54 AM  
**To:** Stuart J. Levine; Heather A. Bradley  
**Cc:** Schember, Steven G.; Dalker, Duane A.; Traub, Seth  
**Subject:** RE: Goodbys v. Arch - Arch Insurance Document Production

Mr. Levine:

We will be happy to provide you with the tiff images. There are a total of 13,282 .tiff files to be transferred, at a cost of \$.06/image, for a total of \$796.92. If you would like printouts of the documents, the charge is \$.12/image, or \$1,593.84. Please let us know which you prefer, and we will provide them to you upon receipt of payment.

I look forward to seeing you tomorrow at 9:00.

Kathy Holmer

**Katherine A. Holmer**  
*Paralegal*  
**Shumaker, Loop & Kendrick, LLP**  
 Bank of America Plaza  
 101 East Kennedy Boulevard  
 Suite 2800  
 Tampa, FL 33602  
 813.229.7600  
 813.227.2344 direct  
 813.229.1660 fax  
 kholmer@slk-law.com  
[www.slk-law.com](http://www.slk-law.com)

7/2/2008

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**From:** Stuart J. Levine [mailto:slevine@WaltersLevine.com]  
**Sent:** Wednesday, April 23, 2008 12:11 PM  
**To:** Holmer, Kathy; Heather A. Bradley  
**Cc:** Schember, Steven G.; Daiker, Duane A.; Traub, Seth  
**Subject:** RE: Goodbys v. Arch - Arch Insurance Document Production

We will take copies of the tiffs.

\*\*\*\*\*  
 Stuart Jay Levine, Esquire  
 Walters Levine Klingensmith & Thomison, P.A.  
 601 Bayshore Blvd., Ste. 720  
 Tampa, FL 33606  
 Phone: (813) 254-7474  
 \*\*\*\*\*

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**From:** Holmer, Kathy [mailto:kholmer@slk-law.com]  
**Sent:** Wednesday, April 23, 2008 11:23 AM  
**To:** Stuart J. Levine; Heather A. Bradley  
**Cc:** Schember, Steven G.; Daiker, Duane A.; Traub, Seth  
**Subject:** Goodbys v. Arch - Arch Insurance Document Production

Dear Mr Levine:

I understand that you will be here at our offices this Friday, April 25, 2008 from 9:00 a.m. to 2:00 p.m. to review documents in the referenced case. In addition to the banker's box of documents from Arch and the 13,000 .tif images which we received electronically, there will be seven (7) double-size banker's boxes containing original files from Auchter available for your review. We received the original files this week.

Please let me know if you have any questions.

**Katherine A. Holmer**  
*Paralegal*  
**Shumaker, Loop & Kendrick, LLP**  
 Bank of America Plaza  
 101 East Kennedy Boulevard  
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