

19TH JUDICIAL DISTRICT COURT FOR THE PARISH OF EAST BATON
ROUGE

STATE OF LOUISIANA

NO.: 651,069

SECTION 22

JAMES J. DONELON, COMMISSIONER OF INSURANCE FOR THE STATE
OF LOUISIANA IN HIS CAPACITY AS REHABILITATOR OF LOUISIANA
HEALTH COOPERATIVE, INC.

VERSUS

GROUP RESOURCES INCORPORATED, MILLIMAN, INC., BUCK GLOBAL,
LLC, AND IRONSHORE SPECIALTY COMPANY

FILED: _____
DEPUTY CLERK

**DEFENDANTS' MOTION AND INCORPORATED MEMORANDUM
TO EXTEND CASE MANAGEMENT SCHEDULE**

NOW INTO COURT, through undersigned counsel, comes Defendants Milliman, Inc. ("Milliman"), Buck Global, LLC ("Buck") and Group Resources Incorporated ("GRI") (collectively, "Defendants"), which respectfully move this Honorable Court to extend this Court's September 14, 2020 Case Management Schedule ("CMS") for good cause shown, and in support thereof, respectfully represent as follows:

INTRODUCTION

The CMS required the parties to substantially complete document production by March 1, 2021. Between the eve of March 1, 2021 and the date of this Motion, the Receiver produced an enormous data set of nearly 2.3 million documents (over 7 million pages). This includes more than 350,000 documents produced after the March 1, 2021 substantial completion deadline, with over 70,000 of those documents produced on June 7. The Receiver's production is still not complete, and we do not know either the volume of what remains to be produced, when he will finish his productions, or when he will provide a privilege log.

We do not bring this motion either to castigate the Receiver's counsel, or to seek any kind of sanction. However, given the size and belated timing of the Receiver's document production, and the importance of LAHC's and the Receiver's documents to the issues in this litigation, an extension of the discovery schedule is necessary to afford Defendants a full and fair opportunity to review the Receiver's ongoing document production and prepare for depositions.

Notwithstanding this reasonable request, the Receiver's counsel does not consent to an extension. On a recent telephone conference with Defendants, the Receiver's counsel argued that Defendants have "had the most relevant documents

for three years” and should simply “get to work.” Neither contention justifies the Receiver’s refusal to consent. Three years ago, the Receiver dumped an impenetrable 7.8 million document production in an unusable and unsearchable format without making any effort to determine whether the documents were responsive to Defendants’ discovery requests or relevant to this matter. This case was then stayed in its entirety for more than two years from March 2018 to April 2020.

Confirming that the Receiver’s 2018 document production was unusable, this Court held in July 2020, shortly after the stay lifted, that the Receiver had not “ma[d]e a good faith effort to respond to specific discovery requests targeted at reasonably identifiable information, materials, and/or data.”¹ The Court ordered the Receiver to review documents for “relevance and responsiveness prior to making a document production to Defendants,” and to redo his production to comply with Louisiana discovery rules. The Receiver began producing documents to Defendants in a usable format on the eve of the March 1, 2021 production deadline; that production is ongoing.

¹ July 13, 2020 Order on GRI Motion to Compel.

Defendants cannot properly prepare for depositions until they have completed a meaningful review of the Receiver's documents. And Defendants cannot reasonably be expected to review and assess the Receiver's ongoing document productions in sufficient time to commence and to complete all fact depositions within the timeframe provided in the CMS, which requires that fact depositions be completed, and fact discovery be finished, by December 1, 2021. The parties' witness lists identify more than 150 witnesses, several dozen of which may have to be deposed.

Therefore, in order to avoid prejudice to Defendants, Defendants respectfully request that all remaining deadlines in the CMS (Paragraphs 5-12) be extended by four months, with the caveat that the deadlines could be further extended if the Receiver fails to complete its document production obligations by the end of this month.

RELEVANT FACTUAL BACKGROUND

Milliman and GRI each served the Receiver with document requests prior to the March 2018 stay, and Buck served document requests on the Receiver on June 4, 2020. The Receiver made no effort to identify and produce materials responsive to Milliman's and GRI's requests as the Louisiana rules require. Instead, in February

of 2018, the Receiver produced an unsearchable, undifferentiated 7.8 million document dump of what appeared to be LAHC's entire server, thus containing millions of irrelevant documents. Before Defendants could address the Receiver's improper production with this Court, the First Circuit Court of Appeal stayed the litigation in its entirety while the parties litigated arbitration and forum selection rights. This Court lifted the stay on April 27, 2020.

On May 11, 2020, GRI filed, and Milliman joined, a Motion to Compel the Receiver to redo his document production and produce documents responsive to Defendants' document requests in a usable format. On July 13, 2020, the Court granted Defendants' motion, in part. The Court ordered the Receiver to respond to specific discovery requests targeted at reasonably identifiable information, materials, and/or data, to review the documents identified by the agreed-upon search terms for relevance and responsiveness prior to making a document production to Defendants, and to produce those documents in a usable format through the engagement of a joint discovery vendor.² The parties were further ordered to work jointly on an e-discovery and search term protocol, which they have done.

² *Id.*

On September 14, 2020, the Court entered the CMS. Following “numerous weeks of negotiations,”³ the parties agreed to a discovery schedule based on the parties’ commitment to “substantially complete production of responsive, non-privileged documents... on or before March 1, 2021.”⁴ By the time the CMS was entered, the Defendants had already searched for, collected, reviewed and produced (or were prepared to produce) their own responsive documents to the Receiver. Only the Receiver had not. Therefore, the March 1, 2021 substantial completion deadline was primarily negotiated to allow *the Receiver* sufficient time to produce all of his documents. Defendants finished producing documents in November of 2020.

On or about March 1, 2021, the Receiver first produced 1.9 million documents. On March 1, 2021, the Receiver also represented to Defendants’ counsel that only a “small amount of additional data” remained to be produced, and on March 15 stated that those productions would be completed by mid-April.⁵

³ CMS at p. 2, Rule 9.5(b) certificate.

⁴ *Id.* at 1.

⁵ E-mail from Andrée M. Cullens, (March 1, 2021, 16:06 EST) (attached as **Exhibit A** hereto); E-mail from Andrée M. Cullens, (March 15, 2021, 15:57 EST) (“[W]e anticipate doing a rolling production with the expectation that everything will be produced in about four weeks”) (attached as **Exhibit A** hereto).

On April 12, 2021, the Receiver produced an additional 241,039 documents, but that production was not the final one. On May 4 and May 7, 2021, the Receiver produced an additional 48,704 documents. And on May 18, 2021, the Receiver informed Defendants that “a significant number of non-privileged threads... were inadvertently pulled in to the privileged documents which now contains a little less than 11,000 document [sic]. . . . My goal is to have all documents to you, other than those to be redacted or wholly withheld by May 28, 2021.”⁶

On June 7, more than three months after his production deadline, the Receiver produced more than 70,000 new documents, and informed Defendants that he may produce thousands of additional documents, although he has not committed to a deadline for that production. Nor has the Receiver committed to a date by which he will serve a privilege log.⁷ In total, the Receiver will have produced *more than 366,000 documents* after the March 1 document production deadline.

Given the size of the Receiver’s 2+ million document production, each of the Defendants has expanded their legal teams to review documents as quickly as

⁶ E-mail from Andrée M. Cullens, (May 18, 2021, 14:46 EST) (attached as **Exhibit B** hereto).

⁷ E-mail from Andrée M. Cullens, (June 3, 2021, 17:21 EST) (attached as **Exhibit C** hereto).

possible. But review of more than two million documents is a massive undertaking that will take additional months to complete. Moreover, the overwhelming majority of the recently produced documents from June are emails with attachments and are multi-page documents, which will require significant time to cull and then to review. The June 7 production alone is over 300,000 pages.

The CMS includes 30 agreed initial dates for depositions between April and November 2021, and other discovery deadlines keyed off of the Receiver's March 1, 2021 substantial completion deadline. On March 12, 2021, the parties agreed not to use the deposition dates reserved for April and May due to the delays in the Receiver's production, and added dates later in the schedule. However, that agreement, which was reached when Defendants were not aware either of the amount of material the Receiver had left to produce, or that the Receiver would not be finished with his productions by June, is not sufficient to allow for all of the document review and depositions that must be completed. The final fact discovery deadline was set for December 1, 2021.⁸ This is no longer realistic nor doable given the Receiver's belated production of 2+ million documents.

⁸ CMS at ¶ 5.

Additionally, Defendants' initial review of some of the documents produced by the Receiver has already revealed major gaps. For instance, there are virtually no documents from the critical time period surrounding LAHC's formation in 2011/2012. Defendants must have the opportunity to follow up on these gaps in the Receiver's production, either from the Receiver or other sources.

Despite these outstanding issues—and even though the Receiver has not complied with the CMS—the Receiver is demanding that Defendants stick to the CMS schedule for depositions and expert discovery.⁹

LAW AND ARGUMENT

The objective of the Louisiana discovery process is to allow parties to obtain pertinent facts, to discover true facts and to compel their disclosure, to assist in trial preparation, to narrow and clarify the issues, and to encourage settlement or abandonment of claims lacking merit. *Hodges v. Southern Farm Bureau Cas. Ins. Co.*, 433 So. 2d 125, 129 (La. 1983). The Receiver's belated productions have disrupted this process and the rest of the schedule set out in the CMS, which was keyed off of the March 1 "substantial completion" of document productions.

⁹ Multiple correspondence from J. Cullens to all counsel dated May 28, 2021, attached hereto en globo as **Exhibit D** (without attachments).

Defendants need additional time to review and then to utilize relevant material culled from the large number of documents produced, to determine what else is missing, and to assess the Receiver's privilege claims on its not yet produced privilege log.

Defendants extended professional courtesies (without Court intervention) to give the Receiver an additional four months (and counting) to produce his documents. In turn, Defendants should be entitled to at least that same extension to review those documents. A fair and appropriate adjustment needs to be made to the remaining pre-trial schedule for the defendants to meaningfully engage in the discovery process for this litigation.

"It is well-established that trial courts in Louisiana have broad discretion when regulating pre-trial discovery." *Moak v. Illinois Cent. R. Co.*, 93-0783 (La. 1/14/94), 631 So. 2d 401, 406. Reasonable extensions of time should be granted for good cause and to prevent manifest injustice. *Wells v. Gillette*, 620 So. 2d 301 (La. Ct. App.), writ denied, 629 So. 2d 396 (La. 1993); *Neff v. Rose*, 546 So. 2d 480 (La. Ct. App.), writ denied, 551 So. 2d 1322 (La. 1989); *cf. Plaia v. Stewart Enterprises, Inc.*, 2014-0159 (La. App. 4 Cir. 10/26/16), 229 So. 3d 480, 491, writ denied, 2016-2264 (La. 2/3/17), 215 So. 3d 692, and writ denied, 2016-2261 (La. 2/3/17), 215 So. 3d 698, and writ denied, 2016-2258 (La. 2/3/17), 215 So. 3d 699. The First Circuit

Court of Appeal has found that it is an abuse of discretion to deny a defendant's motion to extend discovery based on plaintiff's untimely discovery responses. *Dyer v. Am. Serv. Ins. Co.*, 2019-1605 (La. App. 1 Cir. 12/5/19), writ denied, 2019-01915 (La. 12/10/19), 285 So. 3d 492. *Accord Atel Mar. Invs., LP v. Sea Mar Mgmt., L.L.C.*, No. CIV.A. 08-1700, 2009 WL 5214895, at *1 (E.D. La. Dec. 23, 2009) ("Good cause is shown when the schedule cannot reasonably be met despite the diligence of the party seeking the extension."); *Dixon v. Greyhound Lines, Inc.*, No. CIV.A. 13-179-JWD, 2014 WL 6474355, at *2 (M.D. La. Nov. 19, 2014) (extending discovery deadline as a result of circumstances that were beyond the moving party's control); *Kerek v. Crawford Elec. Supply Co., Inc.*, No. CV 18-76-RLB, 2019 WL 1505239, at *2 (M.D. La. Feb. 26, 2019) (finding good cause to extend the deadline to complete expert discovery reasoning that there was no trial date set and modification of the deadline would not cause undue prejudice to the parties).

Good cause exists here for a reasonable extension. This is the first request to amend the CMS and there is no trial date set. Defendants worked cooperatively with the Receiver to reduce the volume of materials to be reviewed, and are now working expeditiously to review the tremendous amount of data produced. However, more time is needed to complete that review given the total volume of documents

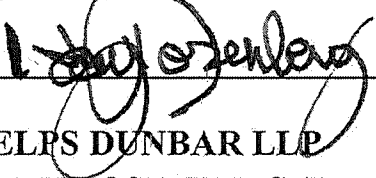
produced, including the ongoing production of hundreds of thousands of documents well past the March 1, 2021 substantial completion deadline. Depriving defendants of this additional time, and thus their right to complete the necessary review, would be a manifest injustice.

The Court should ensure that litigants have a fair opportunity to prepare their case. It would be a deprivation of rights and fundamentally unfair to force Defendants to commence depositions without adequate time to review and prepare, or to truncate the available time for depositions in a case of this magnitude. Defendants, therefore, respectfully represent that the possibility of prejudice from denial of the continuance outweighs any other factors, including the Receiver's interests in having the case judicially resolved. This case relates to a defunct insurance company that went into rehabilitation over five years ago. An additional four months of discovery will in no way prejudice any of the parties.

WHEREFORE, Defendants move for an order extending the Case Management Schedule by four months, and for any other relief to which Defendants may be entitled.

Dated: June 17, 2021
New Orleans, Louisiana

Respectfully submitted,



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Attorneys for Group Resources, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has been served upon all counsel of record via facsimile, e-mail and/or by placing same in the U.S. Mail, postage pre-paid and properly addressed, and by the additional means of service upon the Receiver's counsel by certified mail, return receipt requested.

New Orleans, Louisiana, this 17th day of June, 2021.



Exhibit A

From: Andrée M. Cullens <acullens@lawbr.net>
Sent: Monday, March 15, 2021 3:57 PM
To: Sheri Corales; Shannon Mazur; Margolis, Justine N.; J. Cullens; Luo, Catharine; Kristi Rojas; 'Justin P. Lemaire'; S. Layne Lee; James A Brown; Patti Sollie
Cc: 'Crohan, Blake'; Nicholas, Jessica
Subject: RE: Receiver's ESI Production status

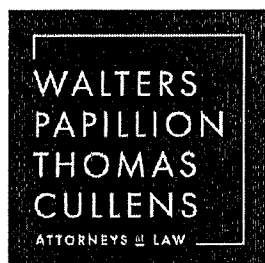
[WARNING: EXTERNAL SENDER]

Sheri,

I believe that Shannon sent everyone an email last week addressing your questions regarding data source 10. As I understand it, we just need input from Defendants regarding what, if anything, you want from that data source.

With respect to the information still in the Shared Data base, we anticipate doing a rolling production with the expectation that everything will be produced in about four weeks.

Regards,



Andrée M. Cullens

12345 Perkins Road, Building 1, Baton Rouge, LA, 70810

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From: Sheri Corales <SCorales@liskow.com>
Sent: Thursday, March 11, 2021 11:40 AM
To: Andrée M. Cullens <acullens@lawbr.net>; Shannon Mazur <s_mazur@tcdi.com>; 'Margolis, Justine N.' <justine.margolis@dentons.com>; J. Cullens <cullens@lawbr.net>; Luo, Catharine <catharine.luo@dentons.com>; Kristi Rojas <krojas@lawbr.net>; 'Justin P. Lemaire' <jlemaire@stonepigman.com>; S. Layne Lee <laynelee@lawbr.net>; James A Brown <jabrown@liskow.com>; Patti Sollie <psollie@lawbr.net>
Cc: 'Crohan, Blake' <Blake.Crohan@alston.com>; Nicholas, Jessica <jessica.nicholas@dentons.com>
Subject: RE: Receiver's ESI Production status

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Hi Andree,

Regarding data source 10, in a prior email (Feb. 5, 2021), Shannon stated that this data had already been processed and suggested having this source produced as processed natives. Is this no longer possible given the technical difficulties you mention in your email?

Also, it is my understanding you are still reviewing some additional data from the Shared Data source and post-receivership files (approx. 100 GB). Do you have an estimate on date of production of that data?

Thank you very much!

Sheri Corales
Associate
Direct 504.556.4186
Lawyer Profile



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From: Andrée M. Cullens <acullens@lawbr.net>
Sent: Monday, March 1, 2021 3:06 PM
To: Shannon Mazur <s_mazur@tcdi.com>; 'Margolis, Justine N.' <justine.margolis@dentons.com>; Sheri Corales <SCorales@liskow.com>; J. Cullens <cullens@lawbr.net>; Luo, Catharine <catharine.luo@dentons.com>; Kristi Rojas <krojas@lawbr.net>; 'Justin P. Lemaire' <jlemaire@stonepigman.com>; S. Layne Lee <laynelee@lawbr.net>; James A Brown <jabrown@liskow.com>; Patti Sollie <psollie@lawbr.net>
Cc: 'Crohan, Blake' <Blake.Crohan@alston.com>; Nicholas, Jessica <jessica.nicholas@dentons.com>
Subject: Receiver's ESI Production status

[EXTERNAL EMAIL]

Good afternoon,

Today, you received a hard drive from TCDI (Drive 1) containing the data set forth on lines 2 through 7 on the attached spreadsheet.

By close of business Wednesday, March 3, 2021, you will receive another hard drive (Drive 2) from TCDI containing the data identified on lines 8 through 11 on the attached spreadsheet. That data is still copying. The drives may make it out in today's UPS delivery, but will definitely be sent tomorrow if not.

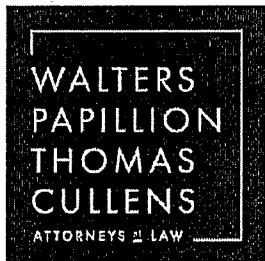
As you can see Drives 1 and 2 include both the segregable data *and* the data that was searched. I am told that TCDI chose to deliver both types of data by hard drive instead of FTP because of the large amount of data delivered and because it is easier to load on your end from a hard drive than an FTP.

With respect to Item 10 on the Exhibit B listing, do the defendants expect this data to be produced? My documents reflect both that these documents are to be produced as segregable files and that we still have not reached an agreement on this issue. The Agreement indicates that "Data store 10 GRI File Exchanges with Vendors 2 contains several folders some of which may not be relevant to the Litigation and/or not contain useable data. Before December 31, 2020, the parties shall meet, confer, and determine whether they can reach agreement regarding which folders will be processed before processing this data store." Shannon tells me that this data source has a large amount of 'junk' and they are having technical issues with getting that set exported for production. How much data we ultimately will produce depends in part on whether and how much of this data is to be produced or not. **Do Defendants want this data to be produced? If so, there will be a delay in production of this data set 10 while TCDI determines how and if they can produce this data. If not, this will quickly assist in determining the estimated amount of data that will be produced. Please let me know if we need to have a call with Shannon and Ned to resolve this.**

You will see on the spreadsheet an additional data source not on Ex. B entitled "Receivership." In light of the court's recent rulings, we have included in this production additional data generated post-receivership that was searched using the same protocol agreed to in the ESI Agreement. This was not part of the data for which we shared billing or covered by the ESI Protocol, but we subjected it to the same search protocols to determine potential relevance and have produced it in the same format as used for the Shared Data.

There is a comparatively small amount of additional data that we are still reviewing for privilege from the Shared Data source and from post-receivership files. I expect to have the total amount of files that remain to be reviewed for privilege by the end of the day, along with the data size and an estimate of how long it will be before production. I will send a follow up email as soon as I know this information.

Regards,



Andrée M. Cullens

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From: Shannon Mazur <s_mazur@tcdi.com>

Sent: Monday, February 22, 2021 12:09 PM

To: 'Margolis, Justine N.' <justine.margolis@dentons.com>; 'Sheri Corales' <SCorales@liskow.com>; Andrée M. Cullens <acullens@lawbr.net>; J. Cullens <cullens@lawbr.net>; Luo, Catharine <catharine.luo@dentons.com>; Kristi Rojas <krojas@lawbr.net>; 'Justin P. Lemaire' <jlemaire@stonepigman.com>; S. Layne Lee <laynelee@lawbr.net>; 'James A Brown' <jabrown@liskow.com>; Patti Sollie <psollie@lawbr.net>

Cc: 'Crohan, Blake' <Blake.Crohan@alston.com>; Nicholas, Jessica <jessica.nicholas@dentons.com>

Subject: RE: 2021.02.04 - LAHC Sharepoint Index Dentons Proposal.DOCX

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Hi Justine,

Thanks for sending this along again. I have physical shipping addresses now for production copies going to Andree, Justin Lemaire and Jessica Nicholas. Sheri – do you have another physical address needing to receive a copy of the production? We are copying productions to a padlock drive as they finish and we are planning to make this shipment at the end of the week.

When you say 'share drive materials' below, are you talking about source '19 Sharepoint'? I have that ready to produce as the three categories based on your identification of files and folders so you should be able to manage those productions by the grouping you have outlined.

Thanks
Shannon

Shannon Mazur

Senior Project Manager

Cell: 508.654.2774

From: Margolis, Justine N. <justine.margolis@dentons.com>
Sent: Monday, February 22, 2021 12:47 PM
To: 'Sheri Corales' <SCorales@liskow.com>; Shannon Mazur <s_mazur@tcdi.com>; 'Andrée M. Cullens' <acullens@lawbr.net>; 'J. Cullens' <cullens@lawbr.net>; Luo, Catharine <catharine.luo@dentons.com>; 'Kristi Rojas' <krojas@lawbr.net>; 'Justin P. Lemaire' <jlemaire@stonepigman.com>; 'S. Layne Lee' <laynelee@lawbr.net>; 'James A Brown' <jabrown@liskow.com>; 'Patti Sollie' <psollie@lawbr.net>
Cc: 'Crohan, Blake' <Blake.Crohan@alston.com>; Nicholas, Jessica <jessica.nicholas@dentons.com>
Subject: RE: 2021.02.04 - LAHC Sharepoint Index Dentons Proposal.DOCX

Hi Shannon,
Andree mentioned you were looking for the address below so just reforwarding in case it was missed. Separately, I want to follow up on the status of producing the share drive materials and separating those productions into Category I and Category II per the parties' prior agreement. Do you have an ETA on those productions?

Thanks



Justine N. Margolis
Partner

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justine.margolis@dentons.com
Bio | Website

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Eric Silwamba, Jalasi and Linyama > Durham Jones & Pinegar > LEAD Advogados > Rattagan
Macchiavello Arocena > Jiménez de Aréchaga, Viana & Brause > Lee International > Kensington Swan

> Bingham Greenebaum > Cohen & Grigsby > Sayarh & Menjra > Larraín Rencoret > For more information on the firms that have come together to form Dentons, go to [dentons.com/legacyfirms](https://www.dentons.com/legacyfirms)

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From: Margolis, Justine N.

Sent: Friday, February 19, 2021 4:57 PM

To: 'Sheri Corales' <SCorales@liskow.com>; Shannon Mazur <s_mazur@tcdi.com>; 'Andrée M. Cullens' <acullens@lawbr.net>; J. Cullens <cullens@lawbr.net>; Luo, Catharine <catharine.luo@dentons.com>; Kristi Rojas <krojas@lawbr.net>; Justin P. Lemaire <jlemaire@stonepigman.com>; S. Layne Lee <laynelee@lawbr.net>; James A Brown <jabrown@liskow.com>; Patti Sollie <psollie@lawbr.net>

Cc: Crohan, Blake <Blake.Crohan@alston.com>; Nicholas, Jessica <jessica.nicholas@dentons.com>

Subject: RE: 2021.02.04 - LAHC Sharepoint Index Dentons Proposal.DOCX

Shannon, you can send these to

Jessica.Nicholas@dentons.com

Dentons US LLP

Attn: Jessica Nicholas

4520 Main Street, Suite 1100

Kansas City, MO 64111



Justine N. Margolis

Partner

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From: Sheri Corales <SCorales@liskow.com>

Sent: Friday, February 19, 2021 1:16 PM

To: Shannon Mazur <s_mazur@tcdi.com>; Margolis, Justine N. <justine.margolis@dentons.com>; 'Andrée M. Cullens' <acullens@lawbr.net>; J. Cullens <cullens@lawbr.net>; Luo, Catharine <catharine.luo@dentons.com>; Kristi Rojas <krojas@lawbr.net>; Justin P. Lemaire <jlemaire@stonepigman.com>; S. Layne Lee <laynelee@lawbr.net>; James A Brown <jabrown@liskow.com>; Patti Sollie <psollie@lawbr.net>
Cc: Crohan, Blake <Blake.Crohan@alston.com>
Subject: RE: 2021.02.04 - LAHC Sharepoint Index Dentons Proposal.DOCX

[External Sender]

Thank you, Shannon. Please provide an approximate data size (GB) of the production documents as soon as it is practicable.

From: Shannon Mazur <s_mazur@tcdi.com>
Sent: Thursday, February 18, 2021 9:38 AM
To: Sheri Corales <SCorales@liskow.com>; 'Margolis, Justine N.' <justine.margolis@dentons.com>; 'Andrée M. Cullens' <acullens@lawbr.net>; J. Cullens <cullens@lawbr.net>; Luo, Catharine <catharine.luo@dentons.com>; Kristi Rojas <krojas@lawbr.net>; Justin P. Lemaire <jlemaire@stonepigman.com>; S. Layne Lee <laynelee@lawbr.net>; James A Brown <jabrown@liskow.com>; Patti Sollie <psollie@lawbr.net>
Cc: Crohan, Blake <Blake.Crohan@alston.com>
Subject: RE: 2021.02.04 - LAHC Sharepoint Index Dentons Proposal.DOCX

[EXTERNAL EMAIL]

Hi Sheri,

Thank you for sending along Blake's contact info! Our support team will be reaching out to him directly with his FTP credentials. I have posted a sample production out to that FTP site for his review. We would like to confirm this formatting works for you in order to start running productions tomorrow starting with the Claims Image data source. At this time, we have just over 1.1 million records to produce from the segregable sets in the screenshot below. Since review is ongoing, we do not have a total estimated record count of production documents. Note that the segregable set number 12 is not listed here because it deduped out entirely during processing.

TALLY: SOURCE (VAR_SOURCE)

1 TO 10 OF 10 APPLY REPORT CANCEL

Overall occurrence count: 1136525 0 selected terms

	Terms	Occurrences
1.	2. DO_NOT_SEARCH CLAIMS IMAGE	948609
2.	DO NOT SEARCH 10	114450
3.	DO_NOT_SEARCH 11. GRI INTERFACE FILES - 837 FILES AS OF 2018-01-23 (.1 GB)	422
4.	DO_NOT_SEARCH 13. GRI INTERFACE FILES - TO HEALTH INTEGRATED AS OF 2018-01-2 (1.9 GB)	786
5.	DO_NOT_SEARCH 19. SHAREPOINT - PRODUCE	38108
6.	DO_NOT_SEARCH 4. CMS FOIA	5
7.	DO_NOT_SEARCH 5. GRI CMS FOLDER AS OF 2018-01-23 (3.4 GB)	4589
8.	DO_NOT_SEARCH 6. GRI EDGE FILES AS OF 2018-01-23 (12.3 GB)	92
9.	DO_NOT_SEARCH 7. GRI EDGE INTERFACE FILES AS OF 2018-01-24 (32.5 GB)	92
10.	DO_NOT_SEARCH 9. GRI FILE EXCHANGES WITH VENDORS 1 AS OF 2018-01-23 (16.7 GB)	29372

Please let us know if any other users need FTP access and we will have their accounts created for approval of the sample production deliverable.

Thanks
Shannon

Shannon Mazur

Senior Project Manager

Cell: 508.654.2774

From: Sheri Corales <SCorales@liskow.com>
Sent: Wednesday, February 17, 2021 5:14 PM

To: Shannon Mazur <s_mazur@tcdi.com>; 'Margolis, Justine N.' <justine.margolis@dentons.com>; 'Andrée M. Cullens' <acullens@lawbr.net>; J. Cullens <cullens@lawbr.net>; Luo, Catharine <catharine.luo@dentons.com>; Kristi Rojas <krojas@lawbr.net>; Justin P. Lemaire <jlemaire@stonepigman.com>; S. Layne Lee <laynelee@lawbr.net>; James A Brown <jabrown@liskow.com>; Patti Sollie <psollie@lawbr.net>
Cc: Crohan, Blake <Blake.Crohan@alston.com>
Subject: RE: 2021.02.04 - LAHC Sharepoint Index Dentons Proposal.DOCX

Hi Shannon,

Please use blake.crohan@alston.com for the FTP user account creation.

We will provide you with a physical address.

Will you please provide an approximate data size of data being produced, including the approximate size of the data on the shared hosting platform (now that the search terms have been narrowed)?

Sheri Corales

Associate

Direct 504.556.4186

Lawyer Profile

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From: Shannon Mazur <s_mazur@tcdi.com>

Sent: Tuesday, February 16, 2021 7:49 AM

To: 'Margolis, Justine N.' <justine.margolis@dentons.com>; 'Andrée M. Cullens' <acullens@lawbr.net>; J. Cullens <cullens@lawbr.net>; Sheri Corales <SCorales@liskow.com>; Luo, Catharine <catharine.luo@dentons.com>; Kristi Rojas <krojas@lawbr.net>; Justin P. Lemaire <jlemaire@stonepigman.com>; S. Layne Lee <laynelee@lawbr.net>; James A Brown <jabrown@liskow.com>; Patti Sollie <psollie@lawbr.net>

Subject: RE: 2021.02.04 - LAHC Sharepoint Index Dentons Proposal.DOCX

[EXTERNAL EMAIL]

Good Morning,

In order to make sure we are all on the same page with production formatting, we would like to deliver a sample production to each party by tomorrow Wed 2/17/2021. Could each receiving party provide me with one email address to use for FTP user account creation? We will then circulate credentials to you individually. We have created a production template in accordance with the agreed upon ESI order and have populated the attached request form with those settings. I imagine we will need to ship some of the larger production volumes on hard drive so please also provide us the best shipping address as well. Please let us know by end of day today if you have any concerns with this formatting.

Thanks

Shannon

Shannon Mazur

Senior Project Manager

Cell: 508.654.2774

From: Margolis, Justine N. <justine.margolis@dentons.com>

Sent: Thursday, February 11, 2021 2:04 PM

To: 'Andrée M. Cullens' <acullens@lawbr.net>; J. Cullens <cullens@lawbr.net>; Sheri Corales <SCorales@liskow.com>; Shannon Mazur <s_mazur@tcdi.com>; Luo, Catharine <catharine.luo@dentons.com>; Kristi Rojas <krojas@lawbr.net>; Justin P. Lemaire <jlemaire@stonepigman.com>; S. Layne Lee <laynelee@lawbr.net>; James A. Brown <jabrown@liskow.com>; Patti Sollie <psollie@lawbr.net>

Subject: RE: 2021.02.04 - LAHC Sharepoint Index Dentons Proposal.DOCX

Is there a new search term hit report that reflects the updated 2/4 sharedrive agreement on segregable data for production? If so, can you please send to me and I can put together one email that reflects the current status of agreements with all relevant documents in one place.

In the interim, with respect to segregable data that is being produced, we agree it need not be hosted in the search platform but do not agree that it should be deleted. And certainly not before we can confirm the productions are working properly with proper metadata etc. Perhaps that data can be stored on external drives so hosting fees are not incurred but the data is maintained.

With respect to non-segregable data, such as the mimecast data, defendants reserved the right to seek additional materials from this data set, including from the excluded custodians.. I am open to suggestions on whether that material can be moved to archive in the interim for cost purposes.

 Justine N. Margolis
Partner

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justine.margolis@dentons.com
Bio | Website

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From: Andrée M. Cullens <acullens@lawbr.net>
Sent: Tuesday, February 09, 2021 7:43 PM
To: Margolis, Justine N. <justine.margolis@dentons.com>; J. Cullens <cullens@lawbr.net>; Sheri Corales <SCorales@liskow.com>; Shannon Mazur <s_mazur@tcdi.com>; Luo, Catharine <catharine.luo@dentons.com>; Kristi Rojas <krojas@lawbr.net>; Justin P. Lemaire <jlemaire@stonepigman.com>; S. Layne Lee <laynelee@lawbr.net>; James A. Brown <jabrown@liskow.com>; Patti Sollie <psollie@lawbr.net>
Subject: RE: 2021.02.04 - LAHC Sharepoint Index Dentons Proposal.DOCX

[External Sender]

Justine,

I sent your 2021.02.04 version of the LAHC SharePoint Index Dentons Proposal to Shannon this morning and she is making sure that only the items under Category III are being loaded into the search platform for review.

I have attached the redlined version of the 2.8.2021 AGREED LOAD and DO NOT LOAD per your request through Catherine.

With respect to the segregable data which is to be produced, I have tweaked your spreadsheet to, I believe, clarify whether the data is processed and produced by TCDI but not loaded into the search platform or loaded into the search platform, searched, reviewed and produced.

I believe we still need to clarify the issue of what TCDI is to do with the segregable data that is not to be included in the search platform after it is produced. There are three classes of data that TCDI has processed so far:

1. Data received and processed for analysis, but were excluded from being produced or searched, primarily the excluded senders in Mimecast, the EDGE VM Server data, and the EHP Server data.
2. Data received and processed for analysis and identified as data to be searched in the search platform, reviewed and then produced.
3. Data received and processed for analysis and identified as segregable data that will not be reviewed but will be produced through TCDI.

We have already agreed that the Data identified in number 2 above would be hosted by TCDI after production. We need to confirm the treatment of the items in numbers 1 and 3.

I recommend that TCDI be allowed to delete now from storage the information that they processed and we identified as not to be produced (number 1 above). The longer they keep it in their system, the longer we incur host charges.

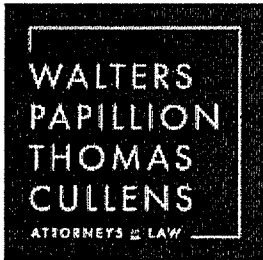
What is the intention from the Defendants' point of view with whether the data identified under category 3 is covered by the extended hosting agreement in the ESI Protocol?

I have also made another category in the tracking spreadsheet showing the confidentiality code that will be

attached to the data in these categories, mainly for TCDI once we approve it so they are on the same page as we are.

Let us know if you want a call to address this. I am generally available tomorrow.

Regards,



Andrée M. Cullens

12345 Perkins Road, Building 1, Baton Rouge, LA, 70810

acullens@lawbr.net

Tel: 225.236.3643 Fax: 225.236.3650

www.lawbr.net

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

From: Margolis, Justine N. <justine.margolis@dentons.com>

Sent: Monday, February 8, 2021 11:03 PM

To: Andrée M. Cullens <acullens@lawbr.net>; Lemaire, Justin P. <jlemaire@stonepigman.com>; 'Sheri Corales' <SCorales@liskow.com>; James A Brown <jabrown@liskow.com>

Cc: Luo, Catharine <catharine.luo@dentons.com>

Subject: RE: 2021.02.04 - LAHC Sharepoint Index Dentons Proposal.DOCX

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Andree,

Confirming the updated sharepoint categories have been provided to shannon so she can run search terms only over category 3.

Thanks

[http://logo.dentons.com/dentons_logo.png]

Justine N. Margolis
Partner

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----- Original message -----

From: "Margolis, Justine N." <justine.margolis@dentons.com>

Date: 2/4/21 3:45 PM (GMT-05:00)

To: "Andrée M. Cullens" <acullens@lawbr.net>, "Lemaire, Justin P." <jlemaire@stonepigman.com>, 'Sheri Corales' <SCorales@liskow.com>, James A Brown <jabrown@liskow.com>

Cc: "Luo, Catharine" <catharine.luo@dentons.com>

Subject: RE: 2021.02.04 - LAHC Sharepoint Index Dentons Proposal.DOCX

Thanks for the question. I forgot to update that header. I think where we landed on the first category is that it will be produced but we haven't yet decided on format for production and whether/how it should be segregated from the remainder of the sharepoint production. I've attached a revised document.

[http://logo.dentons.com/dentons_logo.png]

Justine N. Margolis
Partner

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From: Andrée M. Cullens <acullens@lawbr.net>

Sent: Thursday, February 04, 2021 3:40 PM

To: Margolis, Justine N. <justine.margolis@dentons.com>; Lemaire, Justin P. <jlemaire@stonepigman.com>; 'Sheri Corales' <SCorales@liskow.com>; James A Brown <jabrown@liskow.com>

Cc: Luo, Catharine <catharine.luo@dentons.com>

Subject: RE: 2021.02.04 - LAHC Sharepoint Index Dentons Proposal.DOCX

[External Sender]

Thank you Justine.

I have a question about this. You have one group (First Group) designated as undecided on "whether and how to be produced" and one group as segregable and produced (Second Group). With respect to your questions this morning to Shannon about self-selection of document download, are you suggesting that the First Group is to be self-selected and everyone will be download the Second Group, or that the First Group may not need to be processed for download at all?

I'll ask Shannon about whether they have the ability to process and produce SQL data and circle back.

Regards,

[cid:image002.jpg@01D6FB0C.AF864540]

Andrée M. Cullens

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From: Margolis, Justine N. <justine.margolis@dentons.com<<mailto:justine.margolis@dentons.com>>>
Sent: Thursday, February 4, 2021 2:20 PM
To: Lemaire, Justin P. <jlemaire@stonepigman.com<<mailto:jlemaire@stonepigman.com>>>; Andrée M. Cullens <acullens@lawbr.net<<mailto:acullens@lawbr.net>>>; 'Sheri Corales' <SCorales@liskow.com<<mailto:SCorales@liskow.com>>>; James A Brown <jabrown@liskow.com<<mailto:jabrown@liskow.com>>>
Cc: Luo, Catharine <catharine.luo@dentons.com<<mailto:catharine.luo@dentons.com>>>
Subject: 2021.02.04 - LAHC Sharepoint Index Dentons Proposal.DOCX

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All,

Please see attached updated proposal regarding SharePoint. This contains the same first category of documents we already discussed that are “do not load.” We then separated the rest of the share drive into “to be produced without application of search terms” and “to be searched with search terms and then reviewed for responsiveness.”

Available for any questions

J

[[cid:image001.png@01D6FB0C.AF864540](#)]

Justine N. Margolis
Partner

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Exhibit B

From: Andrée M. Cullens <acullens@lawbr.net>
Sent: Tuesday, May 18, 2021 2:46 PM
To: Sheri Corales; Luo, Catharine
Cc: n_adams@tcdi.com; s_mazur@tcdi.com; Margolis, Justine N.; Lemaire, Justin P.; J. Cullens; Kristi Rojas; S. Layne Lee
Subject: RE: Receiver's ESI Production status

[WARNING: EXTERNAL SENDER]

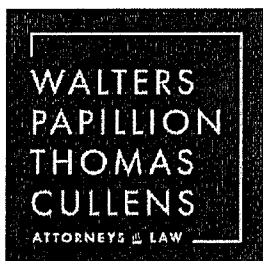
Sheri and Catharine,

The Jeremy Murphy Files and "Congress " folder is part of the source 56 production volume.

In my review, I have determine that there are a significant number of non-privileged threads that were inadvertently pulled in to the privileged documents which now contains a little less than 11,000 document. Shannon and Ned are working on producing those documents to you all. Once that is done, I will have a better idea on how many documents are left to be reviewed, redacted and privileged. My goal is to have all documents to you, other than those documents to be redacted or wholly withheld by May 28, 2021.

For your information, Shannon just informed me today that she is leaving TCDI effective Thursday to pursue a new opportunity. Ned, who has been working on this matter since TCDI took over, will continue to work on this file with us. Please note this for you files.

Regards,



Andrée M. Cullens

12345 Perkins Road, Building 1, Baton Rouge, LA, 70810

acullens@lawbr.net

Tel: 225.236.3643 **Fax:** 225.236.3650

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From: Sheri Corales <SCorales@liskow.com>
Sent: Tuesday, May 18, 2021 11:08 AM
To: Luo, Catharine <catharine.luo@dentons.com>; Andrée M. Cullens <acullens@lawbr.net>
Cc: n_adams@tcdi.com; s_mazur@tcdi.com; Margolis, Justine N. <justine.margolis@dentons.com>; Lemaire, Justin P. <jlemaire@stonepigman.com>; J. Cullens <cullens@lawbr.net>; Kristi Rojas <krojas@lawbr.net>; S. Layne Lee <laynelee@lawbr.net>
Subject: RE: Receiver's ESI Production status

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Hi Andree,

In addition to Catharine's question below, will you please clarify which production contains the Jeremy Murphy files (Source 46) and "Congress" folder?

Thank you very much,

Sheri Corales

Associate

Direct 504.556.4186

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From: Luo, Catharine <catharine.luo@dentons.com>

Sent: Monday, May 17, 2021 1:47 PM

To: Andrée M. Cullens <acullens@lawbr.net>

Cc: n_adams@tcdi.com; s_mazur@tcdi.com; Margolis, Justine N. <justine.margolis@dentons.com>; Lemaire, Justin P. <jlemaire@stonepigman.com>; Sheri Corales <SCorales@liskow.com>; J. Cullens <cullens@lawbr.net>; Kristi Rojas <krojas@lawbr.net>; S. Layne Lee <laynelee@lawbr.net>

Subject: RE: Receiver's ESI Production status

[EXTERNAL EMAIL]

Andree,

Hope you are well. I am writing to follow up on my question from a few weeks ago. Can you please clarify what post-receivership documents remain to be produced, an estimate on volume, and provide an update on timing?

Also, confirming receipt of Shannon's Source 10 replacement production from 5/7.

Thanks,

Catharine



Catharine Luo
Senior Managing Associate

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From: Luo, Catharine
Sent: Friday, April 30, 2021 2:45 PM
To: 'Andrée M. Cullens' <acullens@lawbr.net>
Cc: n_adamis@tcdi.com; s_mazur@tcdi.com; Margolis, Justine N. <justine.margolis@dentons.com>; Lemaire, Justin P. <jlemaire@stonepigman.com>; Sheri Corales <SCorales@liskow.com>; J. Cullens <cullens@lawbr.net>; Kristi Rojas <krojas@lawbr.net>; S. Layne Lee <laynelee@lawbr.net>
Subject: RE: Receiver's ESI Production status

Andree,

Thanks for the additional detail and follow-up below. Can you please clarify what post-receivership documents remain to be produced, an estimate on volume, and provide an update on timing?

Best,

Catharine

 Catharine Luo
Senior Managing Associate

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catharine.luo@dentons.com
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From: Andrée M. Cullens <acullens@lawbr.net>

Sent: Thursday, April 22, 2021 4:26 PM

To: Luo, Catharine <catharine.luo@dentons.com>

Cc: n_adams@tcdi.com; s_mazur@tcdi.com; Margolis, Justine N. <justine.margolis@dentons.com>; Lemaire, Justin P. <jlemaire@stonepigman.com>; Sheri Corales <SCorales@liskow.com>; J. Cullens <cullens@lawbr.net>; Kristi Rojas <krojas@lawbr.net>; S. Layne Lee <laynelee@lawbr.net>

Subject: RE: Receiver's ESI Production status

[WARNING: EXTERNAL SENDER]

Hi Catharine,

Thanks for your patience.

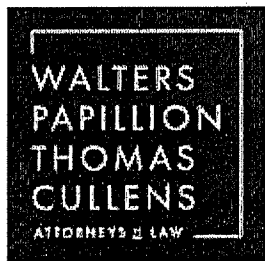
With respect to your question about the post-receivership documents, the attached is a list of the source document counts for all documents created after August 31, 2015, which are post-receivership documents, that have been produced. This totals 37,418 documents. Additionally, 69,999 documents with a Sent Date after 9/1/2015 (this jumps to over 80K when families are pulled in) have been produced. 40,630 documents have a date last modified after 9/1/2015 have been produced. Since there is overlap, TCDI has indicated that like there are 105,224 unique documents falling in one of these date ranges and here is a breakdown of production volumes containing any document in this range.

TALLY: VOL PRODUCTION DATA: PRODUCTION NAME (VOL_PRODUCTION_DATA.PRODUCTION_NAME)		
<div> <div> <div>TO: 11/01/11</div> <div>APPLY REPORT CANCEL</div> </div> </div>		
Overall occurrence count: 105224 0 selected terms		
Terms	Occurrences	
1 20210220.CLAIMSFILES	5	
2 20210222.CMS.FDIA	5	
3 20210222.GH.CMS.FDIOEP.AS.OF.2018-01-23	3	
4 20210222.SOURCES.6.7.8.11.13	225	
5 20210223.19.SHAREPOINTCATEGORYH	10072	
6 20210223.19.LAHCSHAREPOINTCATEGORYI	6572	
7 20210225.MULTISOURCE1	2536	
8 20210225.MULTISOURCE2	14809	
9 20210226.MINECAST	55321	
10 20210228.RECEIVORSHIP	649	
11 20210225.ARCHIVEMINECASTEMAIL	4930	
12 20210410	886	
13 SOURCE.55	6104	

This is by no means all of the post-receivership documents that will be produced. I am working with TCDI to determine when we will complete the review with the exception of marking redactions and preparing a privilege log. I anticipate that will be soon.

I also am awaiting additional information from Shannon at TCDI about the Source 10 documents so that we can determine the costs associate with your requests. I ask Shannon to share that information with us as soon as possible.

Regards,



Andrée M. Cullens

12345 Perkins Road, Building 1, Baton Rouge, LA, 70810

acullens@lawbr.net

Tel: 225.236.3643 Fax: 225.236.3650

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From: Luo, Catharine <catharine.luo@dentons.com>
Sent: Wednesday, April 21, 2021 4:57 PM

To: Andrée M. Cullens <acullens@lawbr.net>
Cc: n_adams@tcdi.com; s_mazur@tcdi.com; Margolis, Justine N. <justine.margolis@dentons.com>; Lemaire, Justin P. <jlemaire@stonepigman.com>; Sheri Corales <SCorales@liskow.com>; J. Cullens <cullens@lawbr.net>; Kristi Rojas <krojas@lawbr.net>; S. Layne Lee <laynelee@lawbr.net>
Subject: RE: Receiver's ESI Production status

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Hi Andree -- I wanted to follow up on the below. Thanks.

 Catharine Luo
Senior Managing Associate

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From: Luo, Catharine
Sent: Wednesday, April 14, 2021 5:50 PM
To: 'Andrée M. Cullens' <acullens@lawbr.net>
Cc: n_adams@tcdi.com; s_mazur@tcdi.com; Margolis, Justine N. <justine.margolis@dentons.com>; Lemaire, Justin P. <jlemaire@stonepigman.com>; Sheri Corales <SCorales@liskow.com>; J. Cullens <cullens@lawbr.net>; Kristi Rojas <krojas@lawbr.net>; S. Layne Lee <laynelee@lawbr.net>
Subject: RE: Receiver's ESI Production status

Andree,

Thanks for the update.

From your email, I understood that the production on April 12 was post-receivership documents, but looking at the metadata, the documents produced on the 12th appear to pre-receivership documents. Can you please clarify what was produced on the 12th and what remains to be

produced? With respect to what remains to be produced, please provide anticipated volume as well as the time period of the documents, and, if appropriate the document category (e.g., pre or post receivership). Please also indicate when you anticipate completing production of those documents.

In your email, you stated that "including the production today" you have produced 37,418 post-receivership documents so far. Can you please direct us to the volumes and folders where those post-receivership documents can be found? As noted, in a quick review of the metadata for the production we received from LAHC this week, it appears that all or nearly all of the documents are pre-receivership so we are not clear what you are comparing.

Thanks again,

Catharine

 Catharine Luo
Senior Managing Associate

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From: Andrée M. Cullens <acullens@lawbr.net>

Sent: Monday, April 12, 2021 3:47 PM

To: Luo, Catharine <catharine.luo@dentons.com>

Cc: n_adams@tcdi.com; s_mazur@tcdi.com; Margolis, Justine N. <justine.margolis@dentons.com>; Lemaire, Justin P. <jlemaire@stonepigman.com>; Sheri Corales <SCorales@liskow.com>; J. Cullens <cullens@lawbr.net>; Kristi Rojas <krojas@lawbr.net>; S. Layne Lee <laynelee@lawbr.net>

Subject: RE: Receiver's ESI Production status

[WARNING: EXTERNAL SENDER]

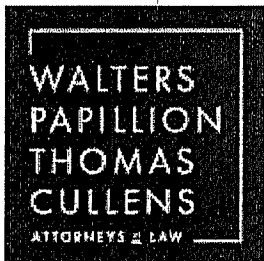
Catharine,

To be thorough, including the production today, we will have produced 37,418 documents created on or after the receivership order was entered on September 1, 2015. A majority of these 37,418 documents were produced prior to

today. If there are specific post-receivership documents which you are looking for, please identify them so we can determine whether they have yet been produced.

To be clear, not all post-receivership documents have produced as we continue to review post receivership documents for privileged and responsiveness. We expect to continue to produce these documents in rolling productions and as efficiently as possible.

Regards,



Andrée M. Cullens

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From: Luo, Catharine <catharine.luo@dentons.com>

Sent: Friday, April 2, 2021 4:00 PM

To: Andrée M. Cullens <acullens@lawbr.net>

Cc: n_adams@tcdi.com; s_mazur@tcdi.com; Margolis, Justine N. <justine.margolis@dentons.com>; Lemaire, Justin P. <jlemaire@stonepigman.com>; Sheri Corales <SCorales@liskow.com>; J. Cullens <cullens@lawbr.net>; Kristi Rojas <krojas@lawbr.net>; S. Layne Lee <laynelee@lawbr.net>

Subject: RE: Receiver's ESI Production status

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Andree,

We wanted to get back to you regarding our outstanding document production issues and questions.

1. Re Item #10 as discussed in your 3/1/21 email below. Shannon had suggested that we isolate potentially useful filetypes from the attached report for production in order to avoid reprocessing fees in the future and indicated that TCDI had identified 1 million duplicate files and only 114K unique files. We are amenable to this suggestion, and think it makes sense for TCDI to provide: (1) a production of the usable processed, de-duped data, and (2) a production of the unprocessed raw data. Before moving forward at cost, glad to discuss or hear recommendations from TCDI re this approach.

2. Re the production of Jeremy Murphy's Laptop Images (#46 in Ex. A): Per your 12/31/2020 email (attached), you noted that Mr. Murphy's laptop (which your notes indicate has already been processed but please confirm) contained a document production in the form of single page tiff images and text files with file names like "LAHC000000##" and a folder labeled "_Congress." We believe the data from Mr. Murphy's "_Congress" folder is relevant to the case, but it does not appear that it was included in Plaintiff's productions. Can you please advise whether those items were produced? If not, we would like to request a supplemental production.

3. In your 3/1/21 email, you referenced a "comparatively small amount of additional data that we are still reviewing for privilege from the Shared Data source and from post-receivership files." On 3/26/2021, we received a production called "20210325_ArchiveMimecast Email" of 5,724 documents. Does the March 26, 2021 production contain the documents referenced in your March 1, 2021 email or do you still anticipate making a further production? We note that the March 26, 2021 production does not appear to contain post-receivership files.

Please cc me on any communications re this action going forward. catharine.luo@dentons.com

Best,

Catharine



Catharine Luo
Senior Managing Associate

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From: Andrée M. Cullens <acullens@lawbr.net>
Sent: Monday, March 01, 2021 4:06 PM
To: Shannon Mazur <s_mazur@tcdi.com>; Margolis, Justine N. <justine.margolis@dentons.com>; 'Sheri Corales' <SCorales@liskow.com>; J. Cullens <cullens@lawbr.net>; Luo, Catharine <catharine.luo@dentons.com>; Kristi Rojas <krojas@lawbr.net>; 'Justin P. Lemaire' <jlemaire@stonepigman.com>; S. Layne Lee <laynelee@lawbr.net>; 'James A Brown' <jabrown@liskow.com>; Patti Sollie <psollie@lawbr.net>
Cc: 'Crohan, Blake' <Blake.Crohan@alston.com>; Nicholas, Jessica <jessica.nicholas@dentons.com>
Subject: Receiver's ESI Production status

[WARNING: EXTERNAL SENDER]

Good afternoon,

Today, you received a hard drive from TCDI (Drive 1) containing the data set forth on lines 2 through 7 on the attached spreadsheet.

By close of business Wednesday, March 3, 2021, you will receive another hard drive (Drive 2) from TCDI containing the data identified on lines 8 through 11 on the attached spreadsheet. That data is still copying. The drives may make it out in today's UPS delivery, but will definitely be sent tomorrow if not.

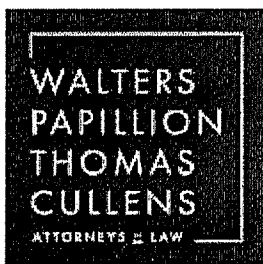
As you can see Drives 1 and 2 include both the segregable data *and* the data that was searched. I am told that TCDI chose to deliver both types of data by hard drive instead of FTP because of the large amount of data delivered and because it is easier to load on your end from a hard drive than an FTP.

With respect to Item 10 on the Exhibit B listing, do the defendants expect this data to be produced? My documents reflect both that these documents are to be produced as segregable files and that we still have not reached an agreement on this issue. The Agreement indicates that "Data store 10 GRI File Exchanges with Vendors 2 contains several folders some of which may not be relevant to the Litigation and/or not contain useable data. Before December 31, 2020, the parties shall meet, confer, and determine whether they can reach agreement regarding which folders will be processed before processing this data store." Shannon tells me that this data source has a large amount of 'junk' and they are having technical issues with getting that set exported for production. How much data we ultimately will produce depends in part on whether and how much of this data is to be produced or not. **Do Defendants want this data to be produced? If so, there will be a delay in production of this data set 10 while TCDI determines how and if they can produce this data. If not, this will quickly assist in determining the estimated amount of data that will be produced. Please let me know if we need to have a call with Shannon and Ned to resolve this.**

You will see on the spreadsheet an additional data source not on Ex. B entitled "Receivership." In light of the court's recent rulings, we have included in this production additional data generated post-receivership that was searched using the same protocol agreed to in the ESI Agreement. This was not part of the data for which we shared billing or covered by the ESI Protocol, but we subjected it to the same search protocols to determine potential relevance and have produced it in the same format as used for the Shared Data.

There is a comparatively small amount of additional data that we are still reviewing for privilege from the Shared Data source and from post-receivership files. I expect to have the total amount of files that remain to be reviewed for privilege by the end of the day, along with the data size and an estimate of how long it will be before production. I will send a follow up email as soon as I know this information.

Regards,



Andrée M. Cullens

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From: Shannon Mazur <s_mazur@tcdi.com>

Sent: Monday, February 22, 2021 12:09 PM

To: 'Margolis, Justine N.' <justine.margolis@dentons.com>; 'Sheri Corales' <SCorales@liskow.com>; Andrée M. Cullens <acullens@lawbr.net>; J. Cullens <cullens@lawbr.net>; Luo, Catharine <catharine.luo@dentons.com>; Kristi Rojas <krojas@lawbr.net>; 'Justin P. Lemaire' <jlemaire@stonepigman.com>; S. Layne Lee <laynelee@lawbr.net>; 'James A Brown' <jabrown@liskow.com>; Patti Sollie <psollie@lawbr.net>

Cc: 'Crohan, Blake' <Blake.Crohan@alston.com>; Nicholas, Jessica <jessica.nicholas@dentons.com>
Subject: RE: 2021.02.04 - LAHC Sharepoint Index Dentons Proposal.DOCX

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Hi Justine,
Thanks for sending this along again. I have physical shipping addresses now for production copies going to Andree, Justin Lemaire and Jessica Nicholas. Sheri – do you have another physical address needing to receive a copy of the production? We are copying productions to a padlock drive as they finish and we are planning to make this shipment at the end of the week.
When you say 'share drive materials' below, are you talking about source '19 Sharepoint'? I have that ready to produce as the three categories based on your identification of files and folders so you should be able to manage those productions by the grouping you have outlined.

Thanks
Shannon

Shannon Mazur

Senior Project Manager

Cell: 508.654.2774

From: Margolis, Justine N. <justine.margolis@dentons.com>
Sent: Monday, February 22, 2021 12:47 PM
To: 'Sheri Corales' <SCorales@liskow.com>; Shannon Mazur <s_mazur@tcdi.com>; 'Andrée M. Cullens' <acullens@lawbr.net>; 'J. Cullens' <cullens@lawbr.net>; Luo, Catharine <catharine.luo@dentons.com>; 'Kristi Rojas' <krojas@lawbr.net>; 'Justin P. Lemaire' <jlemaire@stonepigman.com>; 'S. Layne Lee' <laynelee@lawbr.net>; 'James A Brown' <jabrown@liskow.com>; 'Patti Sollie' <psollie@lawbr.net>
Cc: 'Crohan, Blake' <Blake.Crohan@alston.com>; Nicholas, Jessica <jessica.nicholas@dentons.com>
Subject: RE: 2021.02.04 - LAHC Sharepoint Index Dentons Proposal.DOCX

Hi Shannon,
Andree mentioned you were looking for the address below so just reforwarding in case it was missed. Separately, I want to follow up on the status of producing the share drive materials and separating those productions into Category I and Category II per the parties' prior agreement. Do you have an ETA on those productions?

Thanks



Justine N. Margolis
Partner

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From: Margolis, Justine N.

Sent: Friday, February 19, 2021 4:57 PM

To: 'Sheri Corales' <SCorales@liskow.com>; Shannon Mazur <s_mazur@tcdi.com>; 'Andrée M. Cullens' <acullens@lawbr.net>; J. Cullens <cullens@lawbr.net>; Luo, Catharine <catharine.luo@dentons.com>; Kristi Rojas <krojas@lawbr.net>; Justin P. Lemaire <jlemaire@stonepigman.com>; S. Layne Lee <laynelee@lawbr.net>; James A Brown <jabrown@liskow.com>; Patti Sollie <psollie@lawbr.net>

Cc: Crohan, Blake <Blake.Crohan@alston.com>; Nicholas, Jessica <jessica.nicholas@dentons.com>

Subject: RE: 2021.02.04 - LAHC Sharepoint Index Dentons Proposal.DOCX

Shannon, you can send these to

Jessica.Nicholas@dentons.com

Dentons US LLP
Attn: Jessica Nicholas
4520 Main Street, Suite 1100
Kansas City, MO 64111

 Justine N. Margolis
Partner

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From: Sheri Corales <SCorales@liskow.com>
Sent: Friday, February 19, 2021 1:16 PM
To: Shannon Mazur <s_mazur@tcdi.com>; Margolis, Justine N. <justine.margolis@dentons.com>; 'Andrée M. Cullens' <acullens@lawbr.net>; J. Cullens <cullens@lawbr.net>; Luo, Catharine <catharine.luo@dentons.com>; Kristi Rojas <krojas@lawbr.net>; Justin P. Lemaire <jlemaire@stonepigman.com>; S. Layne Lee <laynelee@lawbr.net>; James A Brown <jabrown@liskow.com>; Patti Sollie <psollie@lawbr.net>
Cc: Crohan, Blake <Blake.Crohan@alston.com>
Subject: RE: 2021.02.04 - LAHC Sharepoint Index Dentons Proposal.DOCX

[External Sender]

Thank you, Shannon. Please provide an approximate data size (GB) of the production documents as soon as it is practicable.

From: Shannon Mazur <s_mazur@tcdi.com>
Sent: Thursday, February 18, 2021 9:38 AM
To: Sheri Corales <SCorales@liskow.com>; 'Margolis, Justine N.' <justine.margolis@dentons.com>; 'Andrée M. Cullens' <acullens@lawbr.net>; J. Cullens <cullens@lawbr.net>; Luo, Catharine <catharine.luo@dentons.com>; Kristi Rojas <krojas@lawbr.net>; Justin P. Lemaire <jlemaire@stonepigman.com>; S. Layne Lee <laynelee@lawbr.net>; James A Brown <jabrown@liskow.com>; Patti Sollie <psollie@lawbr.net>
Cc: Crohan, Blake <Blake.Crohan@alston.com>
Subject: RE: 2021.02.04 - LAHC Sharepoint Index Dentons Proposal.DOCX

[EXTERNAL EMAIL]

Hi Sheri,

Thank you for sending along Blake's contact info! Our support team will be reaching out to him directly with his FTP credentials. I have posted a sample production out to that FTP site for his review. We would like to confirm this formatting works for you in order to start running productions tomorrow starting with the Claims Image data source. At this time, we have just over 1.1 million records to produce from the segregable sets in the screenshot below. Since review is ongoing, we do not have a total estimated record count of production documents. Note that the segregable set number 12 is not listed here because it deduped out entirely during processing.

TALLY: SOURCE (VAR_SOURCE)

1 TO 10 OF 10 APPLY REPORT CANCEL

Overall occurrence count: 1136525 0 selected terms

	Terms	Occurrences
1.	2. DO_NOT_SEARCH CLAIMS IMAGE	948609
2.	DO NOT SEARCH 10	114450
3.	DO_NOT_SEARCH 11 .GRI INTERFACE FILES - 837 FILES AS OF 2018-01-23 (.1 GB)	422
4.	DO_NOT_SEARCH 13. GRI INTERFACE FILES - TO HEALTH INTEGRATED AS OF 2018-01-2 (1.9 GB)	786
5.	DO_NOT_SEARCH 19. SHAREPOINT - PRODUCE	38108
6.	DO_NOT_SEARCH 4. CMS FOIA	5
7.	DO_NOT_SEARCH 5. GRI CMS FOLDER AS OF 2018-01-23 (3.4 GB)	4589
8.	DO_NOT_SEARCH 6. GRI EDGE FILES AS OF 2018-01-23 (12.3 GB)	92
9.	DO_NOT_SEARCH 7. GRI EDGE INTERFACE FILES AS OF 2018-01-24 (32.5 GB)	92
10.	DO_NOT_SEARCH 9. GRI FILE EXCHANGES WITH VENDORS 1 AS OF 2018-01-23 (16.7 GB)	29372

Please let us know if any other users need FTP access and we will have their accounts created for approval of the sample production deliverable.

Thanks
Shannon

Shannon Mazur
Senior Project Manager
Cell: 508.654.2774

From: Sheri Corales <SCorales@liskow.com>
Sent: Wednesday, February 17, 2021 5:14 PM

To: Shannon Mazur <s_mazur@tcdi.com>; 'Margolis, Justine N.' <justine.margolis@dentons.com>; 'Andrée M. Cullens' <acullens@lawbr.net>; J. Cullens <cullens@lawbr.net>; Luo, Catharine <catharine.luo@dentons.com>; Kristi Rojas <krojas@lawbr.net>; Justin P. Lemaire <jlemaire@stonepigman.com>; S. Layne Lee <laynelee@lawbr.net>; James A Brown <jabrown@liskow.com>; Patti Sollie <psollie@lawbr.net>
Cc: Crohan, Blake <Blake.Crohan@alston.com>
Subject: RE: 2021.02.04 - LAHC Sharepoint Index Dentons Proposal.DOCX

Hi Shannon,

Please use blake.crohan@alston.com for the FTP user account creation.

We will provide you with a physical address.

Will you please provide an approximate data size of data being produced, including the approximate size of the data on the shared hosting platform (now that the search terms have been narrowed)?

Sheri Corales

Associate

Direct 504.556.4186

[Lawyer Profile](#)

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From: Shannon Mazur <s_mazur@tcdi.com>

Sent: Tuesday, February 16, 2021 7:49 AM

To: 'Margolis, Justine N.' <justine.margolis@dentons.com>; 'Andrée M. Cullens' <acullens@lawbr.net>; J. Cullens <cullens@lawbr.net>; Sheri Corales <SCorales@liskow.com>; Luo, Catharine <catharine.luo@dentons.com>; Kristi Rojas <krojas@lawbr.net>; Justin P. Lemaire <jlemaire@stonepigman.com>; S. Layne Lee <laynelee@lawbr.net>; James A Brown <jabrown@liskow.com>; Patti Sollie <psollie@lawbr.net>

Subject: RE: 2021.02.04 - LAHC Sharepoint Index Dentons Proposal.DOCX

[EXTERNAL EMAIL]

Good Morning,

In order to make sure we are all on the same page with production formatting, we would like to deliver a sample production to each party by tomorrow Wed 2/17/2021. Could each receiving party provide me with one email address to use for FTP user account creation? We will then circulate credentials to you individually. We have created a production template in accordance with the agreed upon ESI order and have populated the attached request form with those settings. I imagine we will need to ship some of the larger production volumes on hard drive so please also provide us the best shipping address as well. Please let us know by end of day today if you have any concerns with this formatting.

Thanks

Shannon

Shannon Mazur

Senior Project Manager

Cell: 508.654.2774

From: Margolis, Justine N. <justine.margolis@dentons.com>

Sent: Thursday, February 11, 2021 2:04 PM


To: 'Andrée M. Cullens' <acullens@lawbr.net>; J. Cullens <cullens@lawbr.net>; Sheri Corales <SCorales@liskow.com>; Shannon Mazur <s_mazur@tcdi.com>; Luo, Catharine <catharine.luo@dentons.com>; Kristi Rojas <krojas@lawbr.net>; Justin P. Lemaire <jlemaire@stonepigman.com>; S. Layne Lee <laynelee@lawbr.net>; James A. Brown <jabrown@liskow.com>; Patti Sollie <psollie@lawbr.net>

Subject: RE: 2021.02.04 - LAHC Sharepoint Index Dentons Proposal.DOCX

Is there a new search term hit report that reflects the updated 2/4 sharedrive agreement on segregable data for production? If so, can you please send to me and I can put together one email that reflects the current status of agreements with all relevant documents in one place.

In the interim, with respect to segregable data that is being produced, we agree it need not be hosted in the search platform but do not agree that it should be deleted. And certainly not before we can confirm the productions are working properly with proper metadata etc. Perhaps that data can be stored on external drives so hosting fees are not incurred but the data is maintained.

With respect to non-segregable data, such as the mimecast data, defendants reserved the right to seek additional materials from this data set, including from the excluded custodians.. I am open to suggestions on whether that material can be moved to archive in the interim for cost purposes.

 Justine N. Margolis
Partner

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justine.margolis@dentons.com
Bio | Website

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Eric Silwamba, Jalasi and Linyama > Durham Jones & Pinegar > LEAD Advogados > Rattagan Macchiavello Arocena > Jiménez de Aréchaga, Viana & Brause > Lee International > Kensington Swan > Bingham Greenebaum > Cohen & Grigsby > Sayarh & Menjra > Larraín Rencoret > For more information on the firms that have come together to form Dentons, go to dentons.com/legacyfirms

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From: Andrée M. Cullens <acullens@lawbr.net>
Sent: Tuesday, February 09, 2021 7:43 PM
To: Margolis, Justine N. <justine.margolis@dentons.com>; J. Cullens <cullens@lawbr.net>; Sherl Corales <SCorales@liskow.com>; Shannon Mazur <s_mazur@tcdi.com>; Luo, Catharine <catharine.luo@dentons.com>; Kristi Rojas <krojas@lawbr.net>; Justin P. Lemaire <jlemaire@stonepigman.com>; S. Layne Lee <laynelee@lawbr.net>; James A. Brown <jabrown@liskow.com>; Patti Sollie <psollie@lawbr.net>
Subject: RE: 2021.02.04 - LAHC Sharepoint Index Dentons Proposal.DOCX

[External Sender]

Justine,

I sent your 2021.02.04 version of the LAHC SharePoint Index Dentons Proposal to Shannon this morning and she is making sure that only the items under Category III are being loaded into the search platform for review.

I have attached the redlined version of the 2.8.2021 AGREED LOAD and DO NOT LOAD per your request through Catherine.

With respect to the segregable data which is to be produced, I have tweaked your spreadsheet to, I believe, clarify whether the data is processed and produced by TCDI but not loaded into the search platform or loaded into the search platform, searched, reviewed and produced.

I believe we still need to clarify the issue of what TCDI is to do with the segregable data that is not to be included in the search platform after it is produced. There are three classes of data that TCDI has processed so far:

1. Data received and processed for analysis, but were excluded from being produced or searched, primarily the excluded senders in Mimecast, the EDGE VM Server data, and the EHP Server data.
2. Data received and processed for analysis and identified as data to be searched in the search platform, reviewed and then produced.
3. Data received and processed for analysis and identified as segregable data that will not be reviewed but will be produced through TCDI.

We have already agreed that the Data identified in number 2 above would be hosted by TCDI after production. We need to confirm the treatment of the items in numbers 1 and 3.

I recommend that TCDI be allowed to delete now from storage the information that they processed and we identified as not to be produced (number 1 above). The longer they keep it in their system, the longer we incur host charges.

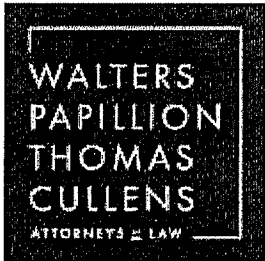
What is the intention from the Defendants' point of view with whether the data identified under category 3 is covered by the extended hosting agreement in the ESI Protocol?

I have also made another category in the tracking spreadsheet showing the confidentiality code that will be

attached to the data in these categories, mainly for TCDI once we approve it so they are on the same page as we are.

Let us know if you want a call to address this. I am generally available tomorrow.

Regards,



Andrée M. Cullens

12345 Perkins Road, Building 1, Baton Rouge, LA, 70810

acullens@lawbr.net

Tel: 225.236.3643 Fax: 225.236.3650

www.lawbr.net

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

From: Margolis, Justine N. <justine.margolis@dentons.com>

Sent: Monday, February 8, 2021 11:03 PM

To: Andrée M. Cullens <acullens@lawbr.net>; Lemaire, Justin P. <jlemaire@stonepigman.com>; 'Sheri Corales' <SCorales@liskow.com>; James A Brown <jabrown@liskow.com>

Cc: Luo, Catharine <catharine.luo@dentons.com>

Subject: RE: 2021.02.04 - LAHC Sharepoint Index Dentons Proposal.DOCX

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Andree,

Confirming the updated sharepoint categories have been provided to shannon so she can run search terms only over category 3.

Thanks

[http://logo.dentons.com/dentons_logo.png]

Justine N. Margolis
Partner

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----- Original message -----

From: "Margolis, Justine N." <justine.margolis@dentons.com>

Date: 2/4/21 3:45 PM (GMT-05:00)

To: "'Andrée M. Cullens'" <acullens@lawbr.net>, "Lemaire, Justin P." <jlemaire@stonepigman.com>, 'Sheri Corales' <SCorales@liskow.com>, James A Brown <jabrown@liskow.com>

Cc: "Luo, Catharine" <catharine.luo@dentons.com>

Subject: RE: 2021.02.04 - LAHC Sharepoint Index Dentons Proposal.DOCX

Thanks for the question. I forgot to update that header. I think where we landed on the first category is that it will be produced but we haven't yet decided on format for production and whether/how it should be segregated from the remainder of the sharepoint production. I've attached a revised document.

[http://logo.dentons.com/dentons_logo.png]

Justine N. Margolis
Partner

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From: Andrée M. Cullens <acullens@lawbr.net>

Sent: Thursday, February 04, 2021 3:40 PM

To: Margolis, Justine N. <justine.margolis@dentons.com>; Lemaire, Justin P. <jlemaire@stonepigman.com>; 'Sheri Corales' <SCorales@liskow.com>; James A Brown <jabrown@liskow.com>

Cc: Luo, Catharine <catharine.luo@dentons.com>

Subject: RE: 2021.02.04 - LAHC Sharepoint Index Dentons Proposal.DOCX

[External Sender]

Thank you Justine.

I have a question about this. You have one group (First Group) designated as undecided on “whether and how to be produced” and one group as segregable and produced (Second Group). With respect to your questions this morning to Shannon about self-selection of document download, are you suggesting that the First Group is to be self-selected and everyone will be download the Second Group, or that the First Group may not need to be processed for download at all?

I'll ask Shannon about whether they have the ability to process and produce SQL data and circle back.

Regards,

[cid:image002.jpg@01D6FB0C.AF864540]

Andrée M. Cullens

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,

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,

LA

,

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From: Margolis, Justine N. <justine.margolis@dentons.com<<mailto:justine.margolis@dentons.com>>>
Sent: Thursday, February 4, 2021 2:20 PM
To: Lemaire, Justin P. <jlemaire@stonepigman.com<<mailto:jlemaire@stonepigman.com>>>; Andrée M. Cullens
<acullens@lawbr.net<<mailto:acullens@lawbr.net>>>; 'Sheri Corales'
<SCorales@liskow.com<<mailto:SCorales@liskow.com>>>; James A Brown
<jabrown@liskow.com<<mailto:jabrown@liskow.com>>>
Cc: Luo, Catharine <catharine.luo@dentons.com<<mailto:catharine.luo@dentons.com>>>
Subject: 2021.02.04 - LAHC Sharepoint Index Dentons Proposal.DOCX

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All,
Please see attached updated proposal regarding SharePoint. This contains the same first category of documents we already discussed that are “do not load.” We then separated the rest of the share drive into “to be produced without application of search terms” and “to be searched with search terms and then reviewed for responsiveness.”

Available for any questions

J

[[cid:image001.png@01D6FB0C.AF864540](#)]

Justine N. Margolis
Partner

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Exhibit C

From: Andrée M. Cullens <acullens@lawbr.net>
Sent: Thursday, June 03, 2021 5:21 PM
To: Luo, Catharine
Cc: Kattan, Justin N.; Margolis, Justine N.; bmason@stonepigman.com; Harry.Rosenberg@phelps.com; jabrown@liskow.com; SCorales@liskow.com; mmckay@stonepigman.com; jlemaire@stonepigman.com; tony.jones@troutman.com; gfagan@leakeandersson.com; J. Cullens; awhitworth@leakeandersson.com; S. Layne Lee; Kristi Rojas
Subject: RE: LAHC--Suit No. 651,069 ; Sec. 22

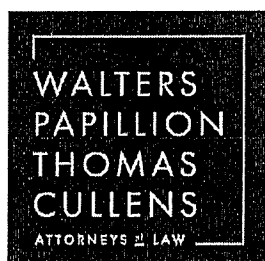
[WARNING: EXTERNAL SENDER]

Catharine,

In further answer to your questions below:

- 2) About 100Gb will be produced, actually it will be produced by FTP on Monday.
- 3) You should see the privilege log/redactions within the next two weeks.
- 4) I don't have exact volumes for redacted documents at this time. Some withholds may become redactions. There are less than 3000 records marked as either privileged or redact, but the whole family for the record may not be privileged. When I have a better sense of the volume, I will update this.

Regards,



Andrée M. Cullens

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From: Luo, Catharine <catharine.luo@dentons.com>
Sent: Wednesday, June 2, 2021 8:30 PM
To: Andrée M. Cullens <acullens@lawbr.net>
Cc: Kattan, Justin N. <justin.kattan@dentons.com>; Margolis, Justine N. <justine.margolis@dentons.com>; bmason@stonepigman.com; Harry.Rosenberg@phelps.com; jabrown@liskow.com; SCorales@liskow.com; mmckay@stonepigman.com; jlemaire@stonepigman.com; tony.jones@troutman.com; gfagan@leakeandersson.com; J. Cullens <cullens@lawbr.net>; awhitworth@leakeandersson.com; S. Layne Lee <laynelee@lawbr.net>; Kristi Rojas <krojas@lawbr.net>
Subject: RE: LAHC--Suit No. 651,069 ; Sec. 22

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Andree,

We are writing to follow-up on your update email from last Friday. Given that we are now three months out from the date by which Plaintiff's production was to be substantially completed, we would appreciate your responses to the following questions.

- 1) Does Plaintiff plans to withhold communications between LDI and the receiver as privileged, and if so what's the basis of the privilege?
- 2) What is the anticipated volume of documents to be produced this week?
- 3) When we can expect to see Plaintiff's priv/redactions log?
- 4) What is the volume of redacted documents you expect to produce?

Best,

Catharine

 Catharine Luo
Senior Managing Associate

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From: Andrée M. Cullens <acullens@lawbr.net>

Sent: Friday, May 28, 2021 5:14 PM

To: Mason, Brett (bmason@stonepigman.com) <bmason@stonepigman.com>; Harry Rosenberg (1219) (Harry.Rosenberg@phelps.com) <Harry.Rosenberg@phelps.com>; Kattan, Justin N. <justin.kattan@dentons.com>; Margolis, Justine N. <justine.margolis@dentons.com>; Brown, James A. (jabrown@liskow.com) <jabrown@liskow.com>; Sheri Corales <SCorales@liskow.com>; Michael McKay (mmckay@stonepigman.com) <mmckay@stonepigman.com>; Margolis, Justine N.

<justine.margolis@dentons.com>; Lemaire, Justin <jlemaire@stonepigman.com>
Cc: Jones, Tony <tony.jones@troutman.com>; George Fagan (gfagan@leakeandersson.com)
<gfagan@leakeandersson.com>; J. Cullens <cullens@lawbr.net>; Whitworth, Adam
<awhitworth@leakeandersson.com>; S. Layne Lee <laynelee@lawbr.net>; Kristi Rojas
<krojas@lawbr.net>
Subject: RE: LAHC--Suit No. 651,069 ; Sec. 22

[WARNING: EXTERNAL SENDER]

Good afternoon,

We have completed review of the ESI data. We anticipate production of the responsive, not privileged information next week. We are now preparing our privilege log and redactions.

Regards,

Andrée M. Cullens

12345 Perkins Road, Building 1, Baton Rouge, LA, 70810

acullens@lawbr.net

Tel: 225.236.3643 Fax: 225.236.3650

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From: J. Cullens <cullens@lawbr.net>

Sent: Friday, May 28, 2021 1:17 PM

To: Mason, Brett (bmason@stonepigman.com) <bmason@stonepigman.com>

Cc: Harry Rosenberg (1219) (Harry.Rosenberg@phelps.com) <Harry.Rosenberg@phelps.com>; Kattan, Justin <justin.kattan@dentons.com>; Margolis, Justine <justine.margolis@dentons.com>; Brown, James A. (jabrown@liskow.com) <jabrown@liskow.com>; Sheri Corales <SCorales@liskow.com>; Michael McKay (mmckay@stonepigman.com) <mmckay@stonepigman.com>; Jones, Tony <tony.jones@troutman.com>; George Fagan (gfagan@leakeandersson.com) <gfagan@leakeandersson.com>; Whitworth, Adam <awhitworth@leakeandersson.com>; S. Layne Lee <laynelee@lawbr.net>; Andrée M. Cullens <acullens@lawbr.net>; Kristi Rojas <krojas@lawbr.net>

Subject: LAHC--Suit No. 651,069 ; Sec. 22

Attached please find a .pdf copy of a request for deposition dates for GRI and several material witnesses.

As always, please call or email me with any questions or concerns.

J. Cullens

J. Cullens

12345 Perkins Road, Building 1, Baton Rouge, LA, 70810

cullens@lawbr.net

Tel: 225.236.3636 Fax: 225.236.3650

www.lawbr.net

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Exhibit D

Mannarino, Maria C.

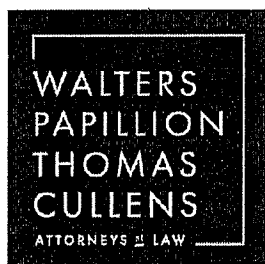
From: J. Cullens <cullens@lawbr.net>
Sent: Friday, May 28, 2021 2:13 PM
To: Harry Rosenberg (1219) (Harry.Rosenberg@phelps.com)
Cc: Kattan, Justin N.; Margolis, Justine N.; Brown, James A. (jabrown@liskow.com); Sheri Corales; Mason, Brett (bmason@stonepigman.com); Michael McKay (mmckay@stonepigman.com); Jones, Tony; George Fagan (gfagan@leakeandersson.com); Whitworth, Adam; S. Layne Lee; Andrée M. Cullens; Kristi Rojas
Subject: RE: LAHC--Suit No. 651,069 ; Sec. 22
Attachments: INT & RFP to Milliman re Actuarial Work - 5 28 21.pdf; Proposed Milliman Notice of Depo - 5 28 21.pdf

[WARNING: EXTERNAL SENDER]

Attached please find .pdf copies of (1) written discovery directed to Milliman; and (2) a request for deposition dates for Milliman and several material witnesses.

As always, please call or email me with any questions or concerns.

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Mannarino, Maria C.

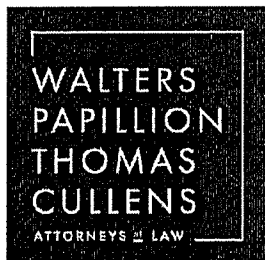
From: J. Cullens <cullens@lawbr.net>
Sent: Friday, May 28, 2021 2:14 PM
To: Brown, James A. (jabrown@liskow.com)
Cc: Harry Rosenberg (1219) (Harry.Rosenberg@phelps.com); Kattan, Justin N.; Margolis, Justine N.; Sheri Corales; Mason, Brett (bmason@stonepigman.com); Michael McKay (mmckay@stonepigman.com); Jones, Tony; George Fagan (gfagan@leakeandersson.com); Whitworth, Adam; S. Layne Lee; Andrée M. Cullens; Kristi Rojas
Subject: LAHC--Suit No. 651,069 ; Sec. 22
Attachments: Proposed Buck Notice of Depo - 5 28 21.pdf

[WARNING: EXTERNAL SENDER]

Attached please find a .pdf copy of a request for deposition dates for Buck and several material witnesses.

As always, please call or email me with any questions or concerns.

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Mannarino, Maria C.

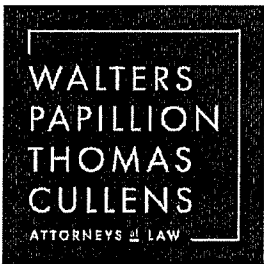
From: J. Cullens <cullens@lawbr.net>
Sent: Friday, May 28, 2021 2:17 PM
To: Mason, Brett (bmason@stonepigman.com)
Cc: Harry Rosenberg (1219) (Harry.Rosenberg@phelps.com); Kattan, Justin N.; Margolis, Justine N.; Brown, James A. (jabrown@liskow.com); Sheri Corales; Michael McKay (mmckay@stonepigman.com); Jones, Tony; George Fagan (gfagan@leakeandersson.com); Whitworth, Adam; S. Layne Lee; Andrée M. Cullens; Kristi Rojas
Subject: LAHC--Suit No. 651,069 ; Sec. 22
Attachments: Proposed GRI Notice of Depo - 5 28 21.pdf

[WARNING: EXTERNAL SENDER]

Attached please find a .pdf copy of a request for deposition dates for GRI and several material witnesses.

As always, please call or email me with any questions or concerns.

J. Cullens



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