

Attachment 2

Alison C. Hunter

From: Alison C. Hunter
Sent: Friday, December 20, 2019 10:50 AM
To: 'Mike Gallegos'
Cc: Susan M. Mathiascheck; John C. Martin; 'Schwartz, Rich'; Maureen R. Witt; 'Paula Maccabee'; 'Vanessa Ray-Hodge'; 'Matt Murdock'; 'Sean Copeland'; 'Elise Larson'; 'Kevin Reuther'; 'dporetti@nilanjohnson.com'; Margo Brownell; Evan Nelson; Brita Larsen
Subject: MPCA - Forensic Search Privilege Log Documents
Attachments: Forensic Search Log_Relators' Preliminary Classification (Dec. 19, 2019).xlsx

Mike,

MPCA has received a request from Relators to conduct a meet-and-confer regarding documents that are on the Privilege Log prepared for the forensic search Xact performed and produced documents from on December 16, 2019. In order to comply with the Court's December 19, 2019 Order (attached in my last email), the parties have agreed, and the court has authorized, Xact to provide the privileged documents identified in the attached spreadsheet just to Holland & Hart. We would defer to you on the best way to transmit the privileged documents identified in the attached spreadsheet to Holland & Hart.

Please let us know if you have any questions.

Thank you,
Alison

Alison Hunter

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800 W. Main Street, Suite 1750, Boise ID 83702
T 208.383.3985 F 208.392.1636



CONFIDENTIALITY NOTICE: This message is confidential and may be privileged. If you believe that this email has been sent to you in error, please reply to the sender that you received the message in error; then please delete this e-mail.

In the Matter of the Denial of Contested Case Hearing Requests and Issuance of National Pollutant Discharge Elimination System/State Disposal System Permit No. MN0071013 for the Proposed NorthMet Project, St. Louis County, Hoyt Lakes, and Babbitt, Minnesota

Court File No. 62-cv-19-4626

Supplemental Privilege Log of Forensically Captured Data

Doc No.	Date	Author	Recipient(s)	File Type	Description	Privilege Claim	Dispute*
Supp-74	12/31/2018	Nebbett, Adonis (MPCA) <adonis.nebbett@state.mn.us>	Lothhammer, Shannon (MPCA) <shannon.lothhammer@state.mn.us>; Udd, Jeff (MPCA) <jeff.udd@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	After permit - String Recipient
Supp-75	11/29/2018	Kuskie, Melissa (MPCA) <michelle.beeman@state.mn.us>	Beeman, Michelle (MPCA) <michelle.beeman@state.mn.us>; Sierks, Bill (MPCA) <bill.sierks@state.mn.us>; Lothhammer, Shannon (MPCA) <shannon.lothhammer@state.mn.us>; Smith, Jeff J (MPCA) <jeff.j.smith@state.mn.us>; Udd, Jeff (MPCA) <jeff.udd@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	After permit - String Recipient
Supp-76	12/13/2018	Nebbett, Adonis (MPCA) <adonis.nebbett@state.mn.us>	Lothhammer, Shannon (MPCA) <shannon.lothhammer@state.mn.us>; Smith, Jeff J (MPCA) <jeff.j.smith@state.mn.us>; Udd, Jeff (MPCA) <jeff.udd@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	After permit - String Recipient
Supp-80	3/27/2017	Neuschler, Catherine (MPCA) <catherine.neuschler@state.mn.us>	Gauthier, Greta (MPCA) <greta.gauthier@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>; Cole, Ann (MPCA) <ann.foss@state.mn.us>	Email	Communication between MPFA personnel	Attorney Client	String Recipient
Supp-81	3/27/2017	Foss, Ann (MPCA) <ann.foss@state.mn.us>	Gauthier, Greta (MPCA) <greta.gauthier@state.mn.us>; Coleman, Jean (MPCA) <jean.coleman@state.mn.us>; Stone, John (MPCA) <john.stone@state.mn.us>	Email Attachment - Word doc	Work Product created at request of counsel	Work Product	No indicia
Supp-82	2/21/2017	Foss, Ann (MPCA) <ann.foss@state.mn.us>	Gauthier, Greta (MPCA) <greta.gauthier@state.mn.us>; Coleman, Jean (MPCA) <jean.coleman@state.mn.us>; Stone, John (MPCA) <john.stone@state.mn.us>	Email	Attorney communication with MPFA general counsel	Attorney Client	String Recipient
Supp-83	2/21/2017	Foss, Ann (MPCA) <ann.foss@state.mn.us>	Gauthier, Greta (MPCA) <greta.gauthier@state.mn.us>; Coleman, Jean (MPCA) <jean.coleman@state.mn.us>; Stone, John (MPCA) <john.stone@state.mn.us>	Email Attachment - PDF	Attorney communication with MPFA general counsel	Attorney Client	No indicia
Supp-84	8/12/2016	Nebbett, Adonis (MPCA) <adonis.nebbett@state.mn.us>	MPFA_PCA_Senior_Managers <sdhousupport.MPCA@state.mn.us>; Koeniggen, Katie E (MPCA) <katie.koeniggen@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	In camera
Supp-85	8/12/2016	Nebbett, Adonis (MPCA) <adonis.nebbett@state.mn.us>	MPFA_PCA_Senior_Managers <sdhousupport.MPCA@state.mn.us>; Koeniggen, Katie E (MPCA) <katie.koeniggen@state.mn.us>	Email Attachment - PDF	Attorney communication with agency personnel	Attorney Client	In camera
Supp-86	8/16/2018	Beeman, Michelle (MPCA) <michelle.beeman@state.mn.us>	Smith, Jeff J (MPCA) <jeff.j.smith@state.mn.us>; Stoltenwerk, Jeff (MPCA) <jeff.stoltenwerk@state.mn.us>; Kuskie, Melissa (MPCA) <michelle.beeman@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	String Recipient
Supp-87	8/16/2018	Beeman, Michelle (MPCA) <michelle.beeman@state.mn.us>	Smith, Jeff J (MPCA) <jeff.j.smith@state.mn.us>; Stoltenwerk, Jeff (MPCA) <jeff.stoltenwerk@state.mn.us>; Kuskie, Melissa (MPCA) <michelle.beeman@state.mn.us>	Email Attachment - PDF	Attorney communication with agency personnel	Attorney Client	No indicia
Supp-88	8/16/2018	Beeman, Michelle (MPCA) <michelle.beeman@state.mn.us>	Smith, Jeff J (MPCA) <jeff.j.smith@state.mn.us>; Stoltenwerk, Jeff (MPCA) <jeff.stoltenwerk@state.mn.us>; Kuskie, Melissa (MPCA) <michelle.beeman@state.mn.us>	Email Attachment - Word doc	Attorney communication with agency personnel	Attorney Client	No indicia
Supp-89	8/16/2018	Smith, Jeff J (MPCA) <jeff.j.smith@state.mn.us>	Nebbett, Adonis (MPCA) <adonis.nebbett@state.mn.us>; Kuskie, Melissa (MPCA) <michelle.beeman@state.mn.us>; Beeman, Michelle (MPCA) <michelle.beeman@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	String Recipient
Supp-90	10/17/2018	Rube Young, CoriAnna (MPCA) <corianna.rube_young@state.mn.us>	Nebbett, Adonis (MPCA) <adonis.nebbett@state.mn.us>; Lothhammer, Shannon (MPCA) <shannon.lothhammer@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	In camera
Supp-91	12/7/2018	Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>	Neuschler, Catherine (MPCA) <catherine.neuschler@state.mn.us>; Lothhammer, Shannon (MPCA) <shannon.lothhammer@state.mn.us>	Email	Attorney communication with MPFA general counsel	Attorney Client	In camera
Supp-92	12/31/2018	Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>	Neuschler, Catherine (MPCA) <catherine.neuschler@state.mn.us>; Lothhammer, Shannon (MPCA) <shannon.lothhammer@state.mn.us>	Email Attachment - PDF	Attorney work product regarding permit appeal	Attorney Client; Work Product	No indicia
Supp-101	12/26/2017	Neuschler, Catherine (MPCA) <catherine.neuschler@state.mn.us>	Udd, Jeff (MPCA) <jeff.udd@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>; Smith, Jeff J (MPCA) <jeff.j.smith@state.mn.us>; Udd, Jeff (MPCA) <jeff.udd@state.mn.us>	Email	Attorney communication with MPFA general counsel	Attorney Client	String Recipient
Supp-102	6/6/2018	Udd, Jeff (MPCA) <jeff.udd@state.mn.us>	Lothhammer, Shannon (MPCA) <shannon.lothhammer@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>	Email	Attorney communication with MPFA general counsel	Attorney Client	String Recipient
Supp-103	6/6/2018	Udd, Jeff (MPCA) <jeff.udd@state.mn.us>	Lothhammer, Shannon (MPCA) <shannon.lothhammer@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>	Email Attachment - Word doc	Attorney communication with MPFA general counsel	Attorney Client	No indicia
Supp-104	3/15/2018	Ooley, Michelle (MPCA) <michelle.ooley@state.mn.us>	Stone, John (MPCA) <john.stone@state.mn.us>; Lothhammer, Shannon (MPCA) <shannon.lothhammer@state.mn.us>; Banks, C (MPCA) <carol.banks@state.mn.us>	Email	Attorney work product regarding permit development	Work Product	String Recipient
Supp-105	3/15/2018	Ooley, Michelle (MPCA) <michelle.ooley@state.mn.us>	Stone, John (MPCA) <john.stone@state.mn.us>; Lothhammer, Shannon (MPCA) <shannon.lothhammer@state.mn.us>; Banks, C (MPCA) <carol.banks@state.mn.us>	Email Attachment - Word doc	Attorney work product regarding permit development	Work Product	No indicia
Supp-106	3/15/2018	Ooley, Michelle (MPCA) <michelle.ooley@state.mn.us>	Stone, John (MPCA) <john.stone@state.mn.us>; Lothhammer, Shannon (MPCA) <shannon.lothhammer@state.mn.us>; Banks, C (MPCA) <carol.banks@state.mn.us>	Email	Attorney work product regarding permit development	Work Product	String Recipient
Supp-107	3/15/2018	Ooley, Michelle (MPCA) <michelle.ooley@state.mn.us>	Stone, John (MPCA) <john.stone@state.mn.us>; Lothhammer, Shannon (MPCA) <shannon.lothhammer@state.mn.us>; Banks, C (MPCA) <carol.banks@state.mn.us>	Email Attachment - Word doc	Attorney work product regarding permit development	Work Product	No indicia
Supp-108	1/9/2017	Neuschler, Catherine (MPCA) <catherine.neuschler@state.mn.us>	Lothhammer, Shannon (MPCA) <shannon.lothhammer@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>	Email	Communication between MPFA personnel	Work Product	No attorney
Supp-109	1/9/2017	Neuschler, Catherine (MPCA) <catherine.neuschler@state.mn.us>	Lothhammer, Shannon (MPCA) <shannon.lothhammer@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>	Email Attachment - Word doc	Communication between MPFA personnel	Work Product	No indicia
Supp-110	6/12/2018	Luckstein, Aaron (MPCA) <aaron.luckstein@state.mn.us>	Luckstein, Aaron (MPCA) <aaron.luckstein@state.mn.us>; Lothhammer, Shannon (MPCA) <shannon.lothhammer@state.mn.us>	Email	Attorney communication with MPFA general counsel	Attorney Client; Work Product	String Recipient
Supp-111	11/9/2018	Schleichert, Pat M (DNR) <pat.schleichert@state.mn.us>	Endler, Sherry (DNR) <sherry.endler@state.mn.us>; Ruffner, Fiona (DNR) <fiona.ruffner@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	String Recipient
Supp-112	11/9/2018	Schleichert, Pat M (DNR) <pat.schleichert@state.mn.us>	Endler, Sherry (DNR) <sherry.endler@state.mn.us>; Ruffner, Fiona (DNR) <fiona.ruffner@state.mn.us>	Email Attachment - PNG	Attorney communication with agency personnel	Attorney Client	No indicia
Supp-113	11/9/2018	Schleichert, Pat M (DNR) <pat.schleichert@state.mn.us>	Endler, Sherry (DNR) <sherry.endler@state.mn.us>; Ruffner, Fiona (DNR) <fiona.ruffner@state.mn.us>	Email Attachment - PNG	Attorney communication with agency personnel	Attorney Client	No indicia
Supp-114	1/17/2017	Baumann, Suzanne (MPCA) <vdo-AMM/OU-EXCHANGE-ADMINISTRATIVE-GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BAUMANN, SUZANNE (N31398803E-45D7-42F9-BF80-3355E7128E99)>	Baumann, Suzanne (MPCA) <vdo-AMM/OU-EXCHANGE-ADMINISTRATIVE-GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BAUMANN, SUZANNE (N31398803E-45D7-42F9-BF80-3355E7128E99)>	Email	Communication between MPFA personnel	Attorney Client	String Recipient
Supp-115	1/17/2018	Foss, Ann (MPCA) <ann.foss@state.mn.us>	Udd, Jeff (MPCA) <jeff.udd@state.mn.us>; Stone, John (MPCA) <john.stone@state.mn.us>; Flood, Rebecca (MPCA) <rebecca.flood@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	String Recipient
Supp-116	9/25/2017	Beeman, Michelle (MPCA) <michelle.beeman@state.mn.us>	Flood, Rebecca (MPCA) <rebecca.flood@state.mn.us>; Nebbett, Adonis (MPCA) <adonis.nebbett@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	String Recipient
Supp-117	1/14/2017	Naramore, Barb (DNR) <vdo-AMM/OU-EXCHANGE-ADMINISTRATIVE-GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=NARAMORE, BARBARA (N31398803E-45D7-42F9-BF80-3355E7128E99)>	Naramore, Barb (DNR) <vdo-AMM/OU-EXCHANGE-ADMINISTRATIVE-GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=NARAMORE, BARBARA (N31398803E-45D7-42F9-BF80-3355E7128E99)>	Email	Communication between MPFA personnel	Attorney Client	String Recipient
Supp-118	1/17/2017	Baumann, Suzanne (MPCA) <vdo-AMM/OU-EXCHANGE-ADMINISTRATIVE-GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BAUMANN, SUZANNE (N31398803E-45D7-42F9-BF80-3355E7128E99)>	Baumann, Suzanne (MPCA) <vdo-AMM/OU-EXCHANGE-ADMINISTRATIVE-GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BAUMANN, SUZANNE (N31398803E-45D7-42F9-BF80-3355E7128E99)>	Email	Communication between MPFA personnel	Attorney Client	String Recipient
Supp-119	1/17/2017	Baumann, Suzanne (MPCA) <vdo-AMM/OU-EXCHANGE-ADMINISTRATIVE-GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BAUMANN, SUZANNE (N31398803E-45D7-42F9-BF80-3355E7128E99)>	Baumann, Suzanne (MPCA) <vdo-AMM/OU-EXCHANGE-ADMINISTRATIVE-GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BAUMANN, SUZANNE (N31398803E-45D7-42F9-BF80-3355E7128E99)>	Email	Communication between MPFA personnel	Attorney Client	String Recipient

* All classifications of disputed documents are subject to addition and amendment.

			MPCA ; Hansen, Douglas (MPCA) ; Aamodt, Daniel (MPCA) ; Benka, David J (MPCA); Wilds, William (MPCA) ; Olesch, Jen (MPCA); Swain, Ed (MPCA); Monson, Bruce A (MPCA); Bourdagh's, Michael (MPCA); Wenz, Zach (DNR); Kelly, Megan J (DNR); Kuske, Melissa (MPCA); Stoltenwerk, Jeff (MPCA); Hoff, Paul (MPCA); Neuschir, Catherine (MPCA) ; Laing, Kimberly (MPCA) ; Pal, Steven (MPCA); Liljeberg, Michael W (DNR); Foss, Ann (MPCA)				
Supp-120	3/7/2018	Peck, Joel (MPCA) <joel.peck@state.mn.us>	Flood, Rebecca (MPCA) <rebecca.flood@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	No attorney
Supp-121	3/7/2018			Final Attachment - Word doc	Work Product created at request of counsel	Work Product	No indicia
Supp-122	3/14/2018	Nellett, Adonis (MPCA) <adonis.nellett@state.mn.us>	Beeman, Michelle (MPCA) <michelle.beeman@state.mn.us>; Flood, Rebecca (MPCA) <rebecca.flood@state.mn.us>; Smith, Jr	Email	Attorney communication with agency personnel	Attorney Client	In camera
Supp-123	3/15/2018	Nellett, Adonis (MPCA) <adonis.nellett@state.mn.us>	Flood, Rebecca (MPCA) <rebecca.flood@state.mn.us>	Email	Attorney communication with MPCA general counsel	Attorney Client	In camera
Supp-124	3/15/2018	Schreier, Paul (MPCA) <paul.schreier@state.mn.us>	Coleman, Jean (MPCA) <jean.coleman@state.mn.us>; Willis, Steven (MPCA) <steven.willis@state.mn.us>; Peck, Joel (MPCA)	Email	Attorney communication with agency personnel	Attorney Client	String Recipient
Supp-125	3/15/2018			Email Attachment - Word doc	Attorney communication with agency personnel	Attorney Client	No indicia
Supp-126	3/14/2018	Flood, Rebecca (MPCA) <v=ExchangeLabel/Exchange Administrative Group (FYD0BH23SP0LT)/CN=RECIPIENTS/CN=0900c0b0004c4d8a1464432224ca-8f100d>	Beeman, Michelle (MPCA) <michelle.beeman@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	No attorney
Supp-127	3/14/2018	Flood, Rebecca (MPCA) <v=EXCHANGE/Exchange Administrative Group (FYD0BH23SP0LT)/CN=RECIPIENTS/CN=0900c0b0004c4d8a1464432224ca-8f100d>	Beeman, Michelle (MPCA) <michelle.beeman@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	No attorney
Supp-128	3/15/2018	Flood, Rebecca (MPCA) <v=ExchangeLabel/Exchange Administrative Group (FYD0BH23SP0LT)/CN=RECIPIENTS/CN=0900c0b0004c4d8a1464432224ca-8f100d>	Nellett, Adonis (MPCA) <adonis.nellett@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	In camera
Supp-129	3/14/2018	Flood, Rebecca (MPCA) <v=EXCHANGE/Exchange Administrative Group (FYD0BH23SP0LT)/CN=RECIPIENTS/CN=0900c0b0004c4d8a1464432224ca-8f100d>	Beeman, Michelle (MPCA) <michelle.beeman@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	No attorney
Supp-130	3/14/2018	Flood, Rebecca (MPCA) <v=ExchangeLabel/Exchange Administrative Group (FYD0BH23SP0LT)/CN=RECIPIENTS/CN=0900c0b0004c4d8a1464432224ca-8f100d>	Beeman, Michelle (MPCA) <michelle.beeman@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	No attorney
Supp-131	3/14/2018	Flood, Rebecca (MPCA) <v=ExchangeLabel/Exchange Administrative Group (FYD0BH23SP0LT)/CN=RECIPIENTS/CN=0900c0b0004c4d8a1464432224ca-8f100d>	Jeff Smith (jeff.j.smith@state.mn.us); Jeff J. Smith (jeff.j.smith@state.mn.us); Udo, Jeff (MPCA) <jeff.udo@state.mn.us>; Shannon Luthar	Email	Attorney communication with agency personnel	Attorney Client	String Recipient
Supp-132	3/12/2017	Clark, Richard (MPCA) <richard.clark@state.mn.us>	Gischia, Scott (Scott.Gischia@CliffNR.com) <Scott.Gischia@CliffNR.com>	Email	Communication between MPCA personnel	Attorney Client	Third party
Supp-133	9/6/2016	Handeland, Stephanie (MPCA) <stephanie.handeland@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>		Email	Communication between MPCA personnel	Attorney Client	String Recipient
Supp-134	3/12/2017	Handeland, Stephanie (MPCA) <stephanie.handeland@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>		Email	Communication between MPCA personnel	Attorney Client	String Recipient
Supp-135	3/12/2017	HANDELAND, STEPHANIE6A77C7D-0429-4276-9212-E2F61600A891 <v=MMQ/OU=EXCHANGE ADMINISTRATIVE GROUP (FYD0BH23SP0LT)/CN=RECIPIENTS/CN=HANDELAND, STEPHANIE6A77C7D-0429-4276-9212-E2F61600A891>	Handeland, Stephanie (MPCA) <stephanie.handeland@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>	Email	Communication between MPCA personnel	Attorney Client	String Recipient
Supp-136	3/12/2017	Handeland, Stephanie (MPCA) <stephanie.handeland@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>		Email	Communication between MPCA personnel	Attorney Client	Third party
Supp-137	3/12/2017	Handeland, Stephanie (MPCA) <stephanie.handeland@state.mn.us>; Christie Kearney (ckearney@polymtminn.com) <ckearney@polymtminn.com>		Email	Communication between MPCA personnel	Attorney Client	Third party
Supp-138	3/12/2017	Handeland, Stephanie (MPCA) <stephanie.handeland@state.mn.us>; Christie Kearney (ckearney@polymtminn.com) <ckearney@polymtminn.com>		Email	Communication between MPCA personnel	Attorney Client	Third party
Supp-139	3/12/2017	Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>; Handeland, Stephanie (MPCA) <stephanie.handeland@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>		Email	Communication between MPCA personnel	Attorney Client	Third party
Supp-140	3/12/2017			Email	Communication between MPCA personnel	Attorney Client	Third party
Supp-141	3/12/2017	Handeland, Stephanie (MPCA) <v=MMQ/OU=EXCHANGE ADMINISTRATIVE GROUP (FYD0BH23SP0LT)/CN=RECIPIENTS/CN=HANDELAND, STEPHANIE6A77C7D-0429-4276-9212-E2F61600A891>	Handeland, Stephanie (MPCA) <stephanie.handeland@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>	Email	Communication between MPCA personnel	Attorney Client	Third party
Supp-142	3/12/2017	Clark, Richard (MPCA) <richard.clark@state.mn.us>; ckearney@polymtminn.com <ckearney@polymtminn.com>; Gischia, Scott (Scott.Gischia@CliffNR.com) <Scott.Gischia@CliffNR.com>		Email	Communication between MPCA personnel	Attorney Client	Third party
Supp-143	3/5/2017	Handeland, Stephanie (MPCA) <v=ExchangeLabel/Exchange Administrative Group (FYD0BH23SP0LT)/CN=RECIPIENTS/CN=HANDELAND, STEPHANIE6A77C7D-0429-4276-9212-E2F61600A891>	Handeland, Stephanie (MPCA) <stephanie.handeland@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>; Fay, Lisa (DNR) <lisa.fay@state.mn.us>; Christie Kearney (ckearney@polymtminn.com) <ckearney@polymtminn.com>; Robin, Jim (MPCA) <jim.robin@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	Third party
Supp-144	9/25/2017	Beeman, Michelle (MPCA) <v=EXCHANGE/Exchange Administrative Group (FYD0BH23SP0LT)/CN=RECIPIENTS/CN=0900c0b0004c4d8a1464432224ca-8f100d>	Beeman, Michelle (MPCA) <michelle.beeman@state.mn.us>; Flood, Rebecca (MPCA) <rebecca.flood@state.mn.us>; Nellett, Adonis (MPCA) <adonis.nellett@state.mn.us>; Bunker, Joshua (MPCA) <joshua.bunker@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Smith, Jeff J (MPCA) <jeff.j.smith@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	String Recipient
Supp-145	9/18/2017	ROBIN, JIM (MPCA) <jim.robin@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>; Schweiss, Brian (MPCA) <brian.schweiss@state.mn.us>; smg@igale-tec.com <smg@igale-tec.com>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Christie Kearney (ckearney@polymtminn.com) <ckearney@polymtminn.com>; Tom Radue <tradue@barr.com>		Email	Communication between MPCA personnel	Attorney Client	Third party
Supp-146	8/10/2016	Handeland, Stephanie (MPCA) <v=MMQ/OU=EXCHANGE ADMINISTRATIVE GROUP (FYD0BH23SP0LT)/CN=RECIPIENTS/CN=HANDELAND, STEPHANIE6A77C7D-0429-4276-9212-E2F61600A891>	Handeland, Stephanie (MPCA) <stephanie.handeland@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	String Recipient
Supp-147	8/10/2016	HANDELAND, STEPHANIE6A77C7D-0429-4276-9212-E2F61600A891 <v=MMQ/OU=EXCHANGE ADMINISTRATIVE GROUP (FYD0BH23SP0LT)/CN=RECIPIENTS/CN=HANDELAND, STEPHANIE6A77C7D-0429-4276-9212-E2F61600A891>	Handeland, Stephanie (MPCA) <stephanie.handeland@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	String Recipient
Supp-148	8/10/2016	HANDELAND, STEPHANIE6A77C7D-0429-4276-9212-E2F61600A891 <v=MMQ/OU=EXCHANGE ADMINISTRATIVE GROUP (FYD0BH23SP0LT)/CN=RECIPIENTS/CN=HANDELAND, STEPHANIE6A77C7D-0429-4276-9212-E2F61600A891>	Handeland, Stephanie (MPCA) <stephanie.handeland@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	String Recipient
Supp-149	8/10/2016	HANDELAND, STEPHANIE6A77C7D-0429-4276-9212-E2F61600A891 <v=MMQ/OU=EXCHANGE ADMINISTRATIVE GROUP (FYD0BH23SP0LT)/CN=RECIPIENTS/CN=HANDELAND, STEPHANIE6A77C7D-0429-4276-9212-E2F61600A891>	Handeland, Stephanie (MPCA) <stephanie.handeland@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	String Recipient
Supp-150	8/10/2016	HANDELAND, STEPHANIE6A77C7D-0429-4276-9212-E2F61600A891 <v=MMQ/OU=EXCHANGE ADMINISTRATIVE GROUP (FYD0BH23SP0LT)/CN=RECIPIENTS/CN=HANDELAND, STEPHANIE6A77C7D-0429-4276-9212-E2F61600A891>	Handeland, Stephanie (MPCA) <stephanie.handeland@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	String Recipient
Supp-151	8/10/2016	HANDELAND, STEPHANIE6A77C7D-0429-4276-9212-E2F61600A891 <v=MMQ/OU=EXCHANGE ADMINISTRATIVE GROUP (FYD0BH23SP0LT)/CN=RECIPIENTS/CN=HANDELAND, STEPHANIE6A77C7D-0429-4276-9212-E2F61600A891>	Handeland, Stephanie (MPCA) <stephanie.handeland@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	String Recipient
Supp-152	8/10/2016	HANDELAND, STEPHANIE6A77C7D-0429-4276-9212-E2F61600A891 <v=MMQ/OU=EXCHANGE ADMINISTRATIVE GROUP (FYD0BH23SP0LT)/CN=RECIPIENTS/CN=HANDELAND, STEPHANIE6A77C7D-0429-4276-9212-E2F61600A891>	Handeland, Stephanie (MPCA) <stephanie.handeland@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	String Recipient
Supp-153	8/10/2016	HANDELAND, STEPHANIE6A77C7D-0429-4276-9212-E2F61600A891 <v=MMQ/OU=EXCHANGE ADMINISTRATIVE GROUP (FYD0BH23SP0LT)/CN=RECIPIENTS/CN=HANDELAND, STEPHANIE6A77C7D-0429-4276-9212-E2F61600A891>	Handeland, Stephanie (MPCA) <stephanie.handeland@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	String Recipient
Supp-154	8/10/2016	HANDELAND, STEPHANIE6A77C7D-0429-4276-9212-E2F61600A891 <v=MMQ/OU=EXCHANGE ADMINISTRATIVE GROUP (FYD0BH23SP0LT)/CN=RECIPIENTS/CN=HANDELAND, STEPHANIE6A77C7D-0429-4276-9212-E2F61600A891>	Handeland, Stephanie (MPCA) <stephanie.handeland@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	String Recipient
Supp-155	8/10/2016	HANDELAND, STEPHANIE6A77C7D-0429-4276-9212-E2F61600A891 <v=MMQ/OU=EXCHANGE ADMINISTRATIVE GROUP (FYD0BH23SP0LT)/CN=RECIPIENTS/CN=HANDELAND, STEPHANIE6A77C7D-0429-4276-9212-E2F61600A891>	Handeland, Stephanie (MPCA) <stephanie.handeland@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	String Recipient
Supp-156	9/8/2017	ROBIN, JIM (MPCA) <jim.robin@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>		Email	Communication between MPCA personnel	Attorney Client	String Recipient
Supp-157	3/12/2017	Baumann, Suzanne (MPCA) <v=MMQ/OU=EXCHANGE ADMINISTRATIVE GROUP (FYD0BH23SP0LT)/CN=RECIPIENTS/CN=BAUMANN, SUZANNE6A77C7D-0429-4276-9212-E2F61600A891>	Baumann, Suzanne (MPCA) <suzanne.baumann@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Coleman, Jean (MPCA) <jean.coleman@state.mn.us>	Email	Communication between MPCA personnel	Attorney Client	String Recipient
Supp-158	12/28/2016	ROBIN, JIM (MPCA) <jim.robin@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>		Email	Attorney communication with MPCA general counsel	Attorney Client	String Recipient

Supp-159	6/27/2017	Clark, Richard (MPCA) <richard.clark@state.mn.us>; Giddings, Steve (MPCA) <steve.giddings@state.mn.us>; Stoltenwerk, Jeff (MPCA) <jstoltenwerk@state.mn.us>	Clark, Richard (MPCA) <richard.clark@state.mn.us>; Giddings, Steve (MPCA) <steve.giddings@state.mn.us>; Stoltenwerk, Jeff (MPCA) <jstoltenwerk@state.mn.us>	Email	Communication between MPCA personnel	Attorney Client	String Recipient
Supp-160	8/30/2017	Robin, Jim (MPCA) <jim.robin@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Monson, Bruce A (MPCA) <bruce.monson@state.mn.us>	Robin, Jim (MPCA) <jim.robin@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Monson, Bruce A (MPCA) <bruce.monson@state.mn.us>	Email	Communication between MPCA personnel	Attorney Client	String Recipient
Supp-161	1/17/2018	Udd, Jeff (MPCA) <judd@state.mn.us>; Sline, John (MPCA) <john.sline@state.mn.us>; Flood, Rebecca (MPCA) <rebecca.flood@state.mn.us>	Udd, Jeff (MPCA) <judd@state.mn.us>; Sline, John (MPCA) <john.sline@state.mn.us>; Flood, Rebecca (MPCA) <rebecca.flood@state.mn.us>	Email	Communication between MPCA personnel	Attorney Client	String Recipient
Supp-162	8/17/2017	Robin, Jim (MPCA) <jim.robin@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Monson, Bruce A (MPCA) <bruce.monson@state.mn.us>	Robin, Jim (MPCA) <jim.robin@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Monson, Bruce A (MPCA) <bruce.monson@state.mn.us>	Email	Communication between MPCA personnel	Attorney Client	String Recipient
Supp-163	11/15/2017	Robin, Jim (MPCA) <jim.robin@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>	Robin, Jim (MPCA) <jim.robin@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>	Email	Communication between MPCA personnel	Attorney Client	String Recipient and Third party
Supp-164	3/31/2017	Clark, Richard (MPCA) <richard.clark@state.mn.us>; Kyser, Scott (MPCA) <scott.kyser@state.mn.us>; Weiss, Steven (MPCA) <steven.weiss@state.mn.us>	Clark, Richard (MPCA) <richard.clark@state.mn.us>; Kyser, Scott (MPCA) <scott.kyser@state.mn.us>; Weiss, Steven (MPCA) <steven.weiss@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	String Recipient
Supp-165	3/31/2017			Email Attachment - Word doc	Attorney communication with agency personnel	Attorney Client	No Indicia
Supp-166	7/12/2016	Stoltenwerk, Jeff (MPCA) <jstoltenwerk@state.mn.us>; Dahl, Tamara D (MPCA) <tamara.dahl@state.mn.us>; Scheiner, Pat (MPCA) <pscheiner@state.mn.us>	Stoltenwerk, Jeff (MPCA) <jstoltenwerk@state.mn.us>; Dahl, Tamara D (MPCA) <tamara.dahl@state.mn.us>; Scheiner, Pat (MPCA) <pscheiner@state.mn.us>	Email	Communication between MPCA personnel	Attorney Client, Work Product	String Recipient
Supp-167	1/10/2017	Dobbin, Laura (MPCA) <laura.dobbin@state.mn.us>; Neuschier, Catherine (MPCA) <catherine.neuschier@state.mn.us>; Co	Dobbin, Laura (MPCA) <laura.dobbin@state.mn.us>; Neuschier, Catherine (MPCA) <catherine.neuschier@state.mn.us>; Co	Email	Communication between MPCA personnel	Attorney Client	No attorney
Supp-168	9/14/2018	Udd, Jeff (MPCA) <judd@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>; Handland, Stephanie (MPCA) <stephanie.handland@state.mn.us>	Udd, Jeff (MPCA) <judd@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>; Handland, Stephanie (MPCA) <stephanie.handland@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	String Recipient
Supp-169	9/14/2018			Email Attachment - Word doc	Attorney communication with MPCA general counsel	Attorney Client	No Indicia
Supp-170	5/10/2017	Robin, Jim (MPCA) <jim.robin@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>	Robin, Jim (MPCA) <jim.robin@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>	Email	Communication between MPCA personnel	Attorney Client	String Recipient
Supp-171	8/30/2016	Handland, Stephanie (MPCA) <stephanie.handland@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>	Handland, Stephanie (MPCA) <stephanie.handland@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>	Email	Communication between MPCA personnel	Attorney Client	String Recipient
Supp-172	9/1/2016	Handland, Stephanie (MPCA) <stephanie.handland@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>	Handland, Stephanie (MPCA) <stephanie.handland@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>	Email	Communication between MPCA personnel	Attorney Client	Third party
Supp-173	8/11/2017	Foss, Ann (MPCA) <ann.foss@state.mn.us>; Sullivan, Jim (MPCA) <jim.sullivan@state.mn.us>; Robinson, Ruth (MPCA) <ruth.robinson@state.mn.us>	Foss, Ann (MPCA) <ann.foss@state.mn.us>; Sullivan, Jim (MPCA) <jim.sullivan@state.mn.us>; Robinson, Ruth (MPCA) <ruth.robinson@state.mn.us>	Email	Communication between MPCA personnel	Attorney Client	Third party
Supp-174	4/6/2017	Fay, Lisa (DNR) <lisa.fay@state.mn.us>; Weisz, Zach (DNR) <zach.weisz@state.mn.us>; Monson, Bruce A (MPCA) <bruce.monson@state.mn.us>	Fay, Lisa (DNR) <lisa.fay@state.mn.us>; Weisz, Zach (DNR) <zach.weisz@state.mn.us>; Monson, Bruce A (MPCA) <bruce.monson@state.mn.us>	Email	Communication between MPCA personnel	Attorney Client	Third party
Supp-175	8/14/2017	Robin, Jim (MPCA) <jim.robin@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>	Robin, Jim (MPCA) <jim.robin@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>	Email	Communication between MPCA personnel	Attorney Client	String Recipient
Supp-176	9/14/2017	Robin, Jim (MPCA) <jim.robin@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>; Sullivan, Jim (MPCA) <jim.sullivan@state.mn.us>; Weisz, Zach (DNR) <zach.weisz@state.mn.us>; Mark Hemingway <mh@hemingway.com>; Lisa Molinsky <lmolinsky@gsi-net.com>; Krish Vijayaraghavan <krishvijayaraghavan@ramboll.com>; Rich Schwartz <rschwartz@crowell.com>	Robin, Jim (MPCA) <jim.robin@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>; Sullivan, Jim (MPCA) <jim.sullivan@state.mn.us>; Weisz, Zach (DNR) <zach.weisz@state.mn.us>; Mark Hemingway <mh@hemingway.com>; Lisa Molinsky <lmolinsky@gsi-net.com>; Krish Vijayaraghavan <krishvijayaraghavan@ramboll.com>; Rich Schwartz <rschwartz@crowell.com>	Email	Communication between MPCA personnel	Attorney Client	Third party
Supp-177	1/11/2017	Baumann, Suzanne (MPCA) <suzanne.baumann@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>; Coleman, Jean (MPCA) <jean.coleman@state.mn.us>	Baumann, Suzanne (MPCA) <suzanne.baumann@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>; Coleman, Jean (MPCA) <jean.coleman@state.mn.us>	Email	Communication between MPCA personnel	Attorney Client	String Recipient
Supp-178	7/20/2017	Handland, Stephanie (MPCA) <stephanie.handland@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>; Giddings, Steve (MPCA) <steve.giddings@state.mn.us>; Mondloch, Mike (MPCA) <mike.mondloch@state.mn.us>; Holkerson, Alex (MPCA) <alex.holkerson@state.mn.us>; Henderson, Julie (MPCA) <julie.henderson@state.mn.us>; Stalmsch, David (MPCA) <david.stalmsch@state.mn.us>; Schwelb, Brian (MPCA) <brian.schwelb@state.mn.us>; Sills, Arians (MPCA) <arians.sills@state.mn.us>; Knowles, Scott (MPCA) <scott.knowles@state.mn.us>	Handland, Stephanie (MPCA) <stephanie.handland@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>; Giddings, Steve (MPCA) <steve.giddings@state.mn.us>; Mondloch, Mike (MPCA) <mike.mondloch@state.mn.us>; Holkerson, Alex (MPCA) <alex.holkerson@state.mn.us>; Henderson, Julie (MPCA) <julie.henderson@state.mn.us>; Stalmsch, David (MPCA) <david.stalmsch@state.mn.us>; Schwelb, Brian (MPCA) <brian.schwelb@state.mn.us>; Sills, Arians (MPCA) <arians.sills@state.mn.us>; Knowles, Scott (MPCA) <scott.knowles@state.mn.us>	Email	Communication between MPCA personnel	Attorney Client	String Recipient
Supp-179	9/26/2016	Handland, Stephanie (MPCA) <stephanie.handland@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>; Christie Kearney <ckearney@polymetmining.com>	Handland, Stephanie (MPCA) <stephanie.handland@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>; Christie Kearney <ckearney@polymetmining.com>	Email	Communication between MPCA personnel	Attorney Client	Third party
Supp-180	9/26/2016	Handland, Stephanie (MPCA) <stephanie.handland@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>; Christie Kearney <ckearney@polymetmining.com>	Handland, Stephanie (MPCA) <stephanie.handland@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>; Christie Kearney <ckearney@polymetmining.com>	Email	Communication between MPCA personnel	Attorney Client	Third party
Supp-181	9/26/2016			Email	Work Product created at request of counsel	Attorney Client	No attorney and No Indicia
Supp-182	1/11/2017	Baumann, Suzanne (MPCA) <suzanne.baumann@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Coleman, Jean (MPCA) <jean.coleman@state.mn.us>	Baumann, Suzanne (MPCA) <suzanne.baumann@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Coleman, Jean (MPCA) <jean.coleman@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	String Recipient
Supp-183	8/30/2017	Robin, Jim (MPCA) <jim.robin@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>	Robin, Jim (MPCA) <jim.robin@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>	Email	Communication between MPCA personnel	Attorney Client	String Recipient
Supp-184	7/12/2016	Foss, Ann (MPCA) <ann.foss@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>; Aleava Sayar <aleava.sayar@state.mn.us>	Foss, Ann (MPCA) <ann.foss@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>; Aleava Sayar <aleava.sayar@state.mn.us>	Email	Communication between MPCA personnel	Attorney Client	Third party
Supp-185	1/6/2017	Clark, Richard (MPCA) <richard.clark@state.mn.us>; Stoltenwerk, Jeff (MPCA) <jstoltenwerk@state.mn.us>; Cole, William (MPCA) <wcolem@state.mn.us>	Clark, Richard (MPCA) <richard.clark@state.mn.us>; Stoltenwerk, Jeff (MPCA) <jstoltenwerk@state.mn.us>; Cole, William (MPCA) <wcolem@state.mn.us>	Email	Attorney communication with MPCA general counsel	Attorney Client	String Recipient
Supp-186	6/22/2017	Alms, Eric (MPCA) <eric.alm@state.mn.us>; Baumann, Suzanne (MPCA) <suzanne.baumann@state.mn.us>; Bouchard, Hans (MPCA) <hans.bouchard@state.mn.us>	Alms, Eric (MPCA) <eric.alm@state.mn.us>; Baumann, Suzanne (MPCA) <suzanne.baumann@state.mn.us>; Bouchard, Hans (MPCA) <hans.bouchard@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	Third party
Supp-187	11/9/2018	Schleichert, Pat M (DNR) <pat.schleichert@state.mn.us>; Endler, Sherry (DNR) <sherry.endler@state.mn.us>; Rutten, Fiona (MPCA) <frutten@state.mn.us>	Schleichert, Pat M (DNR) <pat.schleichert@state.mn.us>; Endler, Sherry (DNR) <sherry.endler@state.mn.us>; Rutten, Fiona (MPCA) <frutten@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	String Recipient
Supp-188	11/9/2018			Email Attachment - PNG	Attorney communication with agency personnel	Attorney Client	No Indicia
Supp-189	11/9/2018			Email Attachment - PNG	Attorney communication with agency personnel	Attorney Client	No Indicia
Supp-190	6/12/2018	Luckstain, Aaron (MPCA) <aaron.luckstain@state.mn.us>; Lathammer, Shannon (MPCA) <shannon.lathammer@state.mn.us>	Luckstain, Aaron (MPCA) <aaron.luckstain@state.mn.us>; Lathammer, Shannon (MPCA) <shannon.lathammer@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	String Recipient
Supp-191	7/22/2018	Alms, Eric (MPCA) <eric.alm@state.mn.us>; Baumann, Suzanne (MPCA) <suzanne.baumann@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>	Alms, Eric (MPCA) <eric.alm@state.mn.us>; Baumann, Suzanne (MPCA) <suzanne.baumann@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	String Recipient
Supp-192	8/16/2018	Smith, Jeff (MPCA) <jsmith@state.mn.us>; Stoltenwerk, Jeff (MPCA) <jstoltenwerk@state.mn.us>; Kuskie, Melissa (MPCA) <mkuskie@state.mn.us>	Smith, Jeff (MPCA) <jsmith@state.mn.us>; Stoltenwerk, Jeff (MPCA) <jstoltenwerk@state.mn.us>; Kuskie, Melissa (MPCA) <mkuskie@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	String Recipient

Supp-193	8/16/2018			Email Attachment - PDF	Attorney communication with agency personnel	Attorney Client	No indicia
Supp-194	8/16/2018			Email Attachment - Word doc	Attorney communication with agency personnel	Attorney Client	No indicia
Supp-195	8/16/2018	Smith, Jeff J (MPCA) <jffsmith@state.mn.us>	Nebbett, Adonis (MPCA) <adonis.nebbett@state.mn.us>; Kusko, Melissa (MPCA) <mikellusa@state.mn.us>; Benham, Mick	Email	Attorney communication with agency personnel	Attorney Client	String Recipient
Supp-196	5/13/2018	Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>	Lothhammer, Shannon (MPCA) <shannon.lothhammer@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	In camera
Supp-206	12/7/2018	Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>	Nebbett, Adonis (MPCA) <adonis.nebbett@state.mn.us>; Lothhammer, Shannon (MPCA) <shannon.lothhammer@state.mn.us>	Email	Attorney communication with MPCA general counsel	Attorney Client	In camera
Supp-207	12/7/2018			Email Attachment - PDF	Attorney communication with MPCA general counsel	Attorney Client	No indicia
Supp-209	12/11/2018	Udel, Jeff (MPCA) <jff.udel@state.mn.us>	Lothhammer, Shannon (MPCA) <shannon.lothhammer@state.mn.us>	Email	Attorney communication with outside counsel	Attorney Client	No attorney
Supp-210	12/11/2018			Email Attachment - Word doc	Attorney work product regarding permit appeal	Attorney Client, Work Product	No indicia
Supp-211	10/27/2018	Rude Young, CoriAnna (MPCA) <corianna.rude_young@state.mn.us>	Verhasselt, Dove (MPCA) <dove.verhasselt@state.mn.us>; Lothhammer, Shannon (MPCA) <shannon.lothhammer@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	No attorney
Supp-212	6/6/2018	Udel, Jeff (MPCA) <jff.udel@state.mn.us>	Lothhammer, Shannon (MPCA) <shannon.lothhammer@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>	Email	Attorney communication with MPCA general counsel	Attorney Client	String Recipient
Supp-213	6/6/2018			Email Attachment - Word doc	Attorney communication with MPCA general counsel	Attorney Client	No indicia
Supp-214	8/10/2016	Handeland, Stephanie (MPCA) <vD-MM5D@EXCHANGE ADMINISTRATIVE GROUP (FYD0BH23SPDLT)@CN=RECIPIENTS@CN=HANDELAND, STEPHANIE@STATE.MN.US>	Handeland, Stephanie (MPCA) <stephanie.handeland@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	String Recipient
Supp-215	8/10/2016	Handeland, Stephanie (MPCA) <vD-MM5D@EXCHANGE ADMINISTRATIVE GROUP (FYD0BH23SPDLT)@CN=RECIPIENTS@CN=HANDELAND, STEPHANIE@STATE.MN.US>	Handeland, Stephanie (MPCA) <stephanie.handeland@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	String Recipient
Supp-216	8/17/2016	Handeland, Stephanie (MPCA) <vD-MM5D@EXCHANGE ADMINISTRATIVE GROUP (FYD0BH23SPDLT)@CN=RECIPIENTS@CN=HANDELAND, STEPHANIE@STATE.MN.US>	Handeland, Stephanie (MPCA) <stephanie.handeland@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>	Email	Attorney communication with MPCA general counsel	Attorney Client	String Recipient
Supp-217	12/23/2016	Basing, Nicole (MPCA) <nicole.basing@state.mn.us>	Basing, Nicole (MPCA) <nicole.basing@state.mn.us>; Pribe, Bill (MPCA) <bill.pribe@state.mn.us>; Moyer, Pam (MPCA) <pam.moyer@state.mn.us>	Email	Communication between MPCA personnel	Attorney Client	No attorney
Supp-218	12/23/2016			Email Attachment - Word doc	Communication between MPCA personnel	Work Product	No attorney and No indicia
Supp-219	8/4/2016	Stollenwerk, Jeff (MPCA) <jff.stollenwerk@state.mn.us>	Flood, Rebecca (MPCA) <rebecca.flood@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>; Verhasselt, Dove (MPCA) <dove.verhasselt@state.mn.us>	Email	Attorney communication with MPCA general counsel	Attorney Client	String Recipient
Supp-220	8/12/2016	Handeland, Stephanie (MPCA) <stephanie.handeland@state.mn.us>	Foss, Ann (MPCA) <ann.foss@state.mn.us>; Clark, Richard (MPCA) <richard.clark@state.mn.us>; Fay, Lisa (DMR) <lisa.fay@dmr.state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	String Recipient
Supp-221	8/17/2016			Email Attachment - Word doc	Attorney communication with agency personnel	Attorney Client	No indicia
Supp-222	8/4/2016	Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>	Stollenwerk, Jeff (MPCA) <jff.stollenwerk@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Verhasselt, Dove (MPCA) <dove.verhasselt@state.mn.us>	Email	Attorney communication with MPCA general counsel	Attorney Client, Work Product	In camera
Supp-223	8/2/2016	Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>	Nebbett, Adonis (MPCA) <adonis.nebbett@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>	Email	Attorney work product regarding permit development	Attorney Client	In camera
Supp-224	8/2/2016			Email Attachment - PDF	Attorney work product regarding permit development	Work Product	No indicia
Supp-225	8/10/2016	Handeland, Stephanie (MPCA) <stephanie.handeland@state.mn.us>	Clark, Richard (MPCA) <richard.clark@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>	Email	Attorney work product regarding permit development	Work Product	String Recipient
Supp-226	8/17/2016			Email Attachment - Word doc	Attorney work product regarding permit development	Work Product	No indicia
Supp-227	8/11/2016	Foss, Ann (MPCA) <vD-MM5D@EXCHANGE ADMINISTRATIVE GROUP (FYD0BH23SPDLT)@CN=RECIPIENTS@CN=FOSS, ANN@STATE.MN.US>	Stollenwerk, Jeff (MPCA) <jff.stollenwerk@state.mn.us>; Flood, Rebecca (MPCA) <rebecca.flood@state.mn.us>	Email	Communication between MPCA personnel	Attorney Client	String Recipient
Supp-228	8/8/2016	Foss, Ann (MPCA) <vD-MM5D@EXCHANGE ADMINISTRATIVE GROUP (FYD0BH23SPDLT)@CN=RECIPIENTS@CN=FOSS, ANN@STATE.MN.US>	Clark, Richard <richard.clark@state.mn.us>; Handeland, Stephanie (MPCA) <stephanie.handeland@state.mn.us>; Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>	Email	Attorney communication with MPCA general counsel	Attorney Client	String Recipient
Supp-229	8/17/2016	Foss, Ann (MPCA) <vD-MM5D@EXCHANGE ADMINISTRATIVE GROUP (FYD0BH23SPDLT)@CN=RECIPIENTS@CN=FOSS, ANN@STATE.MN.US>	Stollenwerk, Jeff (MPCA) <jff.stollenwerk@state.mn.us>; Flood, Rebecca (MPCA) <rebecca.flood@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	String Recipient
Supp-230	8/15/2016	Foss, Ann (MPCA) <ann.foss@state.mn.us>	Handeland, Stephanie (MPCA) <stephanie.handeland@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	No attorney
Supp-231	8/15/2016	Foss, Ann (MPCA) <vD-MM5D@EXCHANGE ADMINISTRATIVE GROUP (FYD0BH23SPDLT)@CN=RECIPIENTS@CN=FOSS, ANN@STATE.MN.US>	Flood, Rebecca (MPCA) <rebecca.flood@state.mn.us>; Clark, Richard <richard.clark@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	String Recipient
Supp-232	8/15/2016			Email Attachment - PDF	Attorney communication with agency personnel	Attorney Client	No indicia
Supp-233	8/8/2016	Foss, Ann (MPCA) <vD-MM5D@EXCHANGE ADMINISTRATIVE GROUP (FYD0BH23SPDLT)@CN=RECIPIENTS@CN=FOSS, ANN@STATE.MN.US>	Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>; Clark, Richard <richard.clark@state.mn.us>; Suzanne Baunton <suzanne.baunton@state.mn.us>	Email	Attorney communication with MPCA general counsel	Attorney Client	String Recipient
Supp-234	8/8/2016			Email Attachment - PDF	Forwarding attorney communication and work product	Attorney Client	No indicia
Supp-235	8/8/2016			Email Attachment - PDF	Forwarding attorney communication and work product	Attorney Client	No indicia
Supp-236	8/8/2016			Email Attachment - PDF	Forwarding attorney communication and work product	Attorney Client	No indicia
Supp-237	8/8/2016			Email Attachment - PDF	Forwarding attorney communication and work product	Attorney Client	No indicia
Supp-238	8/8/2016	Foss, Ann (MPCA) <vD-MM5D@EXCHANGE ADMINISTRATIVE GROUP (FYD0BH23SPDLT)@CN=RECIPIENTS@CN=FOSS, ANN@STATE.MN.US>	Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>; Clark, Richard <richard.clark@state.mn.us>; Handeland, Stephanie (MPCA) <stephanie.handeland@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	String Recipient
Supp-239	8/8/2016			Email Attachment - Word doc	Attorney work product regarding permit development	Work Product	No indicia
Supp-240	8/15/2016	Foss, Ann (MPCA) <vD-MM5D@EXCHANGE ADMINISTRATIVE GROUP (FYD0BH23SPDLT)@CN=RECIPIENTS@CN=FOSS, ANN@STATE.MN.US>	Verhasselt, Dove (MPCA) <dove.verhasselt@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	No attorney
Supp-241	8/15/2016			Email Attachment - PDF	Attorney communication with agency personnel	Attorney Client	No indicia
Supp-242	8/10/2016	Foss, Ann (MPCA) <vD-MM5D@EXCHANGE ADMINISTRATIVE GROUP (FYD0BH23SPDLT)@CN=RECIPIENTS@CN=FOSS, ANN@STATE.MN.US>	Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	In camera
Supp-243	8/15/2016	Foss, Ann (MPCA) <vD-MM5D@EXCHANGE ADMINISTRATIVE GROUP (FYD0BH23SPDLT)@CN=RECIPIENTS@CN=FOSS, ANN@STATE.MN.US>	Handeland, Stephanie (MPCA) <stephanie.handeland@state.mn.us>; Smith, Erik (MPCA) <erik.smith@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	No attorney
Supp-244	8/17/2016	Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>	Stollenwerk, Jeff (MPCA) <jff.stollenwerk@state.mn.us>; Foss, Ann (MPCA) <ann.foss@state.mn.us>	Email Attachment - PDF	Attorney communication with agency personnel	Attorney Client	No indicia
Supp-245	8/17/2016			Email Attachment - PDF	Attorney communication with MPCA general counsel	Attorney Client	In camera
Supp-246	8/17/2016			Email Attachment - Word doc	Attorney communication with MPCA general counsel	Attorney Client	In camera
Supp-247	8/9/2016	Schmidt, Michael R (MPCA) <michael.r.schmidt@state.mn.us>	Foss, Ann (MPCA) <ann.foss@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	No indicia
Supp-248	8/9/2016			Email Attachment - Word doc	Attorney communication with agency personnel	Attorney Client	No indicia
Supp-249	8/12/2016	Nebbett, Adonis (MPCA) <adonis.nebbett@state.mn.us>	#MPCA_PCA_Sensor_Managers <sensor.support.MPCA@state.mn.us>; Koellgen, Katie E (MPCA) <katie.koellgen@state.mn.us>	Email	Attorney communication with agency personnel	Attorney Client	In camera
Supp-250	8/12/2016			Email Attachment - PDF	Attorney communication with agency personnel	Attorney Client	No indicia

Pursuant to Judge Guthman's November 19, 2019 Amended Order Setting Evidentiary Hearing

Alison C. Hunter

From: Alison C. Hunter
Sent: Friday, December 20, 2019 11:05 AM
To: 'Mike Gallegos'
Cc: Susan M. Mathiascheck; John C. Martin; 'Schwartz, Rich'; Maureen R. Witt; 'Paula Maccabee'; 'Vanessa Ray-Hodge'; 'Matt Murdock'; 'Sean Copeland'; 'Elise Larson'; 'Kevin Reuther'; 'dporetti@nilanjohnson.com'; 'Margo Brownell'; 'Evan Nelson'; Brita Larsen
Subject: RE: MPCA - Forensic Search Privilege Log Documents

Mike,

As a follow up and clarification of my last email, the cover email transmitting the documents should only be to Holland & Hart and should not include Relators counsel. After the transmittal to Holland & Hart is made, we would ask that Xact send a pdf of just the transmittal cover email to all parties copied on this email.

Thank you,
Alison

Alison Hunter

Associate, Holland & Hart LLP
 800 W. Main Street, Suite 1750, Boise ID 83702
 T 208.383.3985 F 208.392.1636



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From: Alison C. Hunter
Sent: Friday, December 20, 2019 10:50 AM
To: 'Mike Gallegos' <mgallegos@xactdatadiscovery.com>
Cc: Susan M. Mathiascheck <SMMathiascheck@hollandhart.com>; John C. Martin <JCMartin@hollandhart.com>; 'Schwartz, Rich' <RSchwartz@crowell.com>; Maureen R. Witt <MWitt@hollandhart.com>; 'Paula Maccabee' <pmaccabee@justchangelaw.com>; 'Vanessa Ray-Hodge' <vrayhodge@abqsonosky.com>; 'Matt Murdock' <MMURDOCK@sonosky.com>; 'Sean Copeland' <SeanCopeland@fdlrez.com>; 'Elise Larson' <elarson@mncenter.org>; 'Kevin Reuther' <kreuther@mncenter.org>; 'dporetti@nilanjohnson.com' <dporetti@nilanjohnson.com>; Margo Brownell <Margo.Brownell@maslon.com>; Evan Nelson <Evan.Nelson@maslon.com>; Brita Larsen <BBLarsen@hollandhart.com>
Subject: MPCA - Forensic Search Privilege Log Documents

Mike,

MPCA has received a request from Relators to conduct a meet-and-confer regarding documents that are on the Privilege Log prepared for the forensic search Xact performed and produced documents from on December 16, 2019. In order to comply with the Court's December 19, 2019 Order (attached in my last email), the parties have agreed, and the court has authorized, Xact to provide the privileged documents identified in the attached spreadsheet just to Holland & Hart. We would defer to you on the best way to transmit the privileged documents identified in the attached spreadsheet to Holland & Hart.

Please let us know if you have any questions.

Thank you,
Alison

Alison Hunter

Associate, Holland & Hart LLP

800 W. Main Street, Suite 1750, Boise ID 83702

T 208.383.3985 F 208.392.1636



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Alison C. Hunter

From: Alison C. Hunter
Sent: Friday, December 20, 2019 4:55 PM
To: 'Mike Gallegos'
Cc: Susan M. Mathiascheck; John C. Martin; 'Schwartz, Rich'; Maureen R. Witt; 'Paula Maccabee'; 'Vanessa Ray-Hodge'; 'Matt Murdock'; 'Sean Copeland'; 'Elise Larson'; 'Kevin Reuther'; 'dporetti@nilanjohnson.com'; Margo Brownell; Evan Nelson; Brita Larsen
Subject: RE: MPCA - Forensic Search Privilege Log Documents
Attachments: 2019-12-16 Supplemental Privilege Log of Forensically Captured Data w-Control Nos.pdf

Mike,

Attached please find the complete forensic search privilege log with the document IDs. This has more documents than those Relators are challenging, but Xact should be able to pull the document IDs for the documents Relators identified from the attached.

In regard to providing the documents for our review, we would prefer that you send them to us (myself and Brita) by native export as you proposed. Please also disable any logins that would allow us to access Xact's Relativity database.

Thank you,
Alison

Alison Hunter

Associate, Holland & Hart LLP
 800 W. Main Street, Suite 1750, Boise ID 83702
 T 208.383.3985 F 208.392.1636



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From: Mike Gallegos <mgallegos@xactdatadiscovery.com>
Sent: Friday, December 20, 2019 4:12 PM
To: Alison C. Hunter <ACHunter@hollandhart.com>
Cc: Susan M. Mathiascheck <SMMathiascheck@hollandhart.com>; John C. Martin <JCMartin@hollandhart.com>; 'Schwartz, Rich' <RSchwartz@crowell.com>; Maureen R. Witt <MWitt@hollandhart.com>; 'Paula Maccabee' <pmaccabee@justchangelaw.com>; 'Vanessa Ray-Hodge' <vrayhodge@abqsonosky.com>; 'Matt Murdock' <MMURDOCK@sonosky.com>; 'Sean Copeland' <SeanCopeland@fdlrez.com>; 'Elise Larson' <elaron@mncenter.org>; 'Kevin Reuther' <kreuther@mncenter.org>; 'dporetti@nilanjohnson.com' <dporetti@nilanjohnson.com>; Margo Brownell <Margo.Brownell@maslon.com>; Evan Nelson <Evan.Nelson@maslon.com>; Brita Larsen <BBLarsen@hollandhart.com>
Subject: RE: MPCA - Forensic Search Privilege Log Documents

External Email

Alison,

Can you provide us with the document IDs for the documents identified on the privilege log? We can then set up a saved search with just those privileged documents within the Relativity workspace. You could view them in the Relativity or we could do a native export of those documents and send them to Holland & Hart.

Mike

Mike Gallegos | Director, eDiscovery Sales
XACT DATA DISCOVERY

T | 801.851.5284
C | 385.226.2452

30 E. Broadway Suite 300
Salt Lake City, UT 84111

XDD acquires QDiscovery to further expand services in Midwest and East Coast. [Learn more >](#)

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From: Mike Gallegos

Sent: Friday, December 20, 2019 2:49 PM

To: 'Alison C. Hunter' <ACHunter@hollandhart.com>

Cc: Susan M. Mathiascheck <SMMathiascheck@hollandhart.com>; John C. Martin <JCMartin@hollandhart.com>; 'Schwartz, Rich' <RSchwartz@crowell.com>; Maureen R. Witt <MWitt@hollandhart.com>; 'Paula Maccabee' <pmaccabee@justchangelaw.com>; 'Vanessa Ray-Hodge' <vrayhodge@abqsonosky.com>; 'Matt Murdock' <MMURDOCK@sonosky.com>; 'Sean Copeland' <SeanCopeland@fdlrez.com>; 'Elise Larson' <el Larson@mncenter.org>; 'Kevin Reuther' <kreuther@mncenter.org>; 'dporetti@nilanjohnson.com' <dporetti@nilanjohnson.com>; Margo Brownell <Margo.Brownell@maslon.com>; Evan Nelson <Evan.Nelson@maslon.com>; Brita Larsen <BBLarsen@hollandhart.com>

Subject: RE: MPCA - Forensic Search Privilege Log Documents

Understood.

Mike

From: Alison C. Hunter <ACHunter@hollandhart.com>

Sent: Friday, December 20, 2019 11:05 AM

To: Mike Gallegos <mgallegos@xactdatadiscovery.com>

Cc: Susan M. Mathiascheck <SMMathiascheck@hollandhart.com>; John C. Martin <JCMartin@hollandhart.com>; 'Schwartz, Rich' <RSchwartz@crowell.com>; Maureen R. Witt <MWitt@hollandhart.com>; 'Paula Maccabee' <pmaccabee@justchangelaw.com>; 'Vanessa Ray-Hodge' <vrayhodge@abqsonosky.com>; 'Matt Murdock' <MMURDOCK@sonosky.com>; 'Sean Copeland' <SeanCopeland@fdlrez.com>; 'Elise Larson' <el Larson@mncenter.org>; 'Kevin Reuther' <kreuther@mncenter.org>; 'dporetti@nilanjohnson.com' <dporetti@nilanjohnson.com>; Margo Brownell <Margo.Brownell@maslon.com>; Evan Nelson <Evan.Nelson@maslon.com>; Brita Larsen <BBLarsen@hollandhart.com>

Subject: RE: MPCA - Forensic Search Privilege Log Documents

Mike,

As a follow up and clarification of my last email, the cover email transmitting the documents should only be to Holland & Hart and should not include Relators counsel. After the transmittal to Holland & Hart is made, we would ask that Xact send a pdf of just the transmittal cover email to all parties copied on this email.

Thank you,
Alison

Alison Hunter

Associate, Holland & Hart LLP
800 W. Main Street, Suite 1750, Boise ID 83702
T 208.383.3985 F 208.392.1636



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From: Alison C. Hunter

Sent: Friday, December 20, 2019 10:50 AM

To: 'Mike Gallegos' <mgallegos@xactdatadiscovery.com>

Cc: Susan M. Mathiascheck <SMMathiascheck@hollandhart.com>; John C. Martin <JCMartin@hollandhart.com>; 'Schwartz, Rich' <RSchwartz@crowell.com>; Maureen R. Witt <MWitt@hollandhart.com>; 'Paula Maccabee' <pmaccabee@justchangelaw.com>; 'Vanessa Ray-Hodge' <vrayhodge@abqsonosky.com>; 'Matt Murdock' <MMURDOCK@sonosky.com>; 'Sean Copeland' <SeanCopeland@fdlrez.com>; 'Elise Larson' <elarson@mncenter.org>; 'Kevin Reuther' <kreuther@mncenter.org>; 'dporetti@nilanjohnson.com' <dporetti@nilanjohnson.com>; Margo Brownell <Margo.Brownell@maslon.com>; Evan Nelson <Evan.Nelson@maslon.com>; Brita Larsen <BBLarsen@hollandhart.com>

Subject: MPCA - Forensic Search Privilege Log Documents

Mike,

MPCA has received a request from Relators to conduct a meet-and-confer regarding documents that are on the Privilege Log prepared for the forensic search Xact performed and produced documents from on December 16, 2019. In order to comply with the Court's December 19, 2019 Order (attached in my last email), the parties have agreed, and the court has authorized, Xact to provide the privileged documents identified in the attached spreadsheet just to Holland & Hart. We would defer to you on the best way to transmit the privileged documents identified in the attached spreadsheet to Holland & Hart.

Please let us know if you have any questions.

Thank you,
Alison

Alison Hunter

Associate, Holland & Hart LLP
800 W. Main Street, Suite 1750, Boise ID 83702
T 208.383.3985 F 208.392.1636



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Alison C. Hunter

From: Mike Gallegos <mgallegos@xactdatadiscovery.com>
Sent: Friday, December 27, 2019 9:46 AM
To: Alison C. Hunter
Cc: Vanessa Ray-Hodge; Evan Nelson; Susan M. Mathiascheck; John C. Martin; Schwartz, Rich; Maureen R. Witt; Paula Maccabee; Matt Murdock; Sean Copeland; Elise Larson; Kevin Reuther; dporetti@nilanjohnson.com; Margo Brownell; Brita Larsen; Stephanie Omsberg
Subject: RE: MPCA - Forensic Search Privilege Log Documents
Attachments: MPCA - Forensic Search Privilege Log Documents ((33550-9) Delivery Notification.pdf

External Email

Attached is the transmittal email from the privilege export.

Mike

Mike Gallegos | Director, eDiscovery Sales
XACT DATA DISCOVERY

T | 801.851.5284
C | 385.226.2452

30 E. Broadway Suite 300
Salt Lake City, UT 84111

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From: Mike Gallegos
Sent: Friday, December 27, 2019 9:25 AM
To: Alison C. Hunter <ACHunter@hollandhart.com>
Cc: Vanessa Ray-Hodge <vrayhodge@abqsonosky.com>; Evan Nelson <Evan.Nelson@maslon.com>; Susan M. Mathiascheck <SMMathiascheck@hollandhart.com>; John C. Martin <JCMartin@hollandhart.com>; Schwartz, Rich <RSchwartz@crowell.com>; Maureen R. Witt <MWitt@hollandhart.com>; Paula Maccabee <pmaccabee@justchangelaw.com>; Matt Murdock <MMURDOCK@sonosky.com>; Sean Copeland <SeanCopeland@fdlrez.com>; Elise Larson <elarson@mncenter.org>; Kevin Reuther <kreuther@mncenter.org>; dporetti@nilanjohnson.com; Margo Brownell <Margo.Brownell@maslon.com>; Brita Larsen <BBLarsen@hollandhart.com>; Stephanie Omsberg <SOmsberg@hollandhart.com>
Subject: RE: MPCA - Forensic Search Privilege Log Documents

Attached is the transmittal email for the MPCA documents.

Mike

From: Mike Gallegos <mgallegos@xactdatadiscovery.com>
Sent: Thursday, December 26, 2019 3:24 PM
To: Alison C. Hunter <ACHunter@hollandhart.com>
Cc: Vanessa Ray-Hodge <vrayhodge@abqsonosky.com>; Evan Nelson <Evan.Nelson@maslon.com>; Susan M. Mathiascheck <SMMathiascheck@hollandhart.com>; John C. Martin <JCMartin@hollandhart.com>; Schwartz, Rich <RSchwartz@crowell.com>; Maureen R. Witt <MWitt@hollandhart.com>; Paula Maccabee <pmaccabee@justchangelaw.com>; Matt Murdock <MMURDOCK@sonosky.com>; Sean Copeland <SeanCopeland@fdlrez.com>; Elise Larson <elaron@mncenter.org>; Kevin Reuther <kreuther@mncenter.org>; dporetti@nilanjohnson.com; Margo Brownell <Margo.Brownell@maslon.com>; Brita Larsen <BBLarsen@hollandhart.com>; Stephanie Omsberg <SOmsberg@hollandhart.com>
Subject: Re: MPCA - Forensic Search Privilege Log Documents

Final exports are being finalized and are on track to be delivered tomorrow.

On Dec 26, 2019, at 2:09 PM, Alison C. Hunter <ACHunter@hollandhart.com> wrote:

Mike,

MPCA confirms that these can be exported to H&H. Has Xact already begun the process of exporting the other search results to H&H? When can we expect to receive those?

Thank you,
Alison

<image001.png>

Alison Hunter

Associate, Holland & Hart LLP
800 W. Main Street, Suite 1750, Boise ID 83702
T 208.383.3985 F 208.392.1636

<image002.png>

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From: Mike Gallegos <mgallegos@xactdatadiscovery.com>
Sent: Thursday, December 26, 2019 9:34 AM
To: Vanessa Ray-Hodge <vrayhodge@abqsonosky.com>; Evan Nelson <Evan.Nelson@maslon.com>; Alison C. Hunter <ACHunter@hollandhart.com>
Cc: Susan M. Mathiascheck <SMMathiascheck@hollandhart.com>; John C. Martin <JCMartin@hollandhart.com>; Schwartz, Rich <RSchwartz@crowell.com>; Maureen R. Witt <MWitt@hollandhart.com>; Paula Maccabee <pmaccabee@justchangelaw.com>; Matt Murdock <MMURDOCK@SONOSKY.COM>; Sean Copeland <SeanCopeland@fdlrez.com>; Elise Larson <elaron@mncenter.org>; Kevin Reuther <kreuther@mncenter.org>; dporetti@nilanjohnson.com; Margo Brownell <Margo.Brownell@maslon.com>; Brita Larsen <BBLarsen@hollandhart.com>
Subject: RE: MPCA - Forensic Search Privilege Log Documents

External Email

Good morning.

We will not conduct any custom deduplication against the “Deleted – Recovered Emails”. We will only run deduplication within the data set. After running deduplication within the “Deleted – Recovered Emails” only and applying the date filter and court ordered search terms we have a final data set to be exported and reviewed is 4,493 documents. I have attached the search reports for your review.

Please confirm that these results can be exported to H&H.

Mike Gallegos | Director, eDiscovery Sales
XACT DATA DISCOVERY

T | 801.851.5284
C | 385.226.2452

30 E. Broadway Suite 300
Salt Lake City, UT 84111

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From: Mike Gallegos
Sent: Tuesday, December 24, 2019 4:39 PM
To: 'Vanessa Ray-Hodge' <vrayhodge@abqsonosky.com>; Evan Nelson <Evan.Nelson@maslon.com>; Alison C. Hunter <ACHunter@hollandhart.com>
Cc: Susan M. Mathiascheck <SMMathiascheck@hollandhart.com>; John C. Martin <JCMartin@hollandhart.com>; Schwartz, Rich <RSchwartz@crowell.com>; Maureen R. Witt <MWitt@hollandhart.com>; Paula Maccabee <pmaccabee@justchangelaw.com>; Matt Murdock <MMURDOCK@SONOSKY.COM>; Sean Copeland <SeanCopeland@fdlrez.com>; Elise Larson <elaron@mncenter.org>; Kevin Reuther <kreuther@mncenter.org>; dporetti@nilanjohnson.com; Margo Brownell <Margo.Brownell@maslon.com>; Brita Larsen <BBLarsen@hollandhart.com>
Subject: RE: MPCA - Forensic Search Privilege Log Documents

I will check with my project management team on this. I will hold off on sending the export until this is resolved.

Mike

From: Vanessa Ray-Hodge <vrayhodge@abqsonosky.com>
Sent: Tuesday, December 24, 2019 4:34 PM
To: Mike Gallegos <mgallegos@xactdatadiscovery.com>; Evan Nelson <Evan.Nelson@maslon.com>; Alison C. Hunter <ACHunter@hollandhart.com>
Cc: Susan M. Mathiascheck <SMMathiascheck@hollandhart.com>; John C. Martin <JCMartin@hollandhart.com>; Schwartz, Rich <RSchwartz@crowell.com>; Maureen R. Witt <MWitt@hollandhart.com>; Paula Maccabee <pmaccabee@justchangelaw.com>; Matt Murdock <MMURDOCK@SONOSKY.COM>; Sean Copeland <SeanCopeland@fdlrez.com>; Elise Larson <elaron@mncenter.org>; Kevin Reuther <kreuther@mncenter.org>; dporetti@nilanjohnson.com;

Margo Brownell <Margo.Brownell@maslon.com>; Brita Larsen <BBLarsen@hollandhart.com>
Subject: RE: MPCA - Forensic Search Privilege Log Documents

Mike,

Relators would like to clarify that if a document was deleted, even if it is 100% duplicative of a document in the batch of 26,288, it is relevant and should be produced in the batch of "Deleted and Recovered" data so that the Court and Relators know that the document was deleted and recovered. As such, we do not agree that you should run a "custom deduplication of the remaining documents against the 26,288 and exclude any 100% duplicate documents from the packaging of "Delated and Recovered" data."

Thank you,
Vanessa

From: Mike Gallegos <mgallegos@xactdatadiscovery.com>
Sent: Tuesday, December 24, 2019 10:50 AM
To: Evan Nelson <Evan.Nelson@maslon.com>; Alison C. Hunter <ACHunter@hollandhart.com>
Cc: Susan M. Mathiascheck <SMMathiascheck@hollandhart.com>; John C. Martin <JCMartin@hollandhart.com>; Schwartz, Rich <RSchwartz@crowell.com>; Maureen R. Witt <MWitt@hollandhart.com>; Paula Maccabee <pmaccabee@justchangelaw.com>; Vanessa Ray-Hodge <vrayhodge@abqsonosky.com>; Matt Murdock <MMURDOCK@SONOSKY.COM>; Sean Copeland <SeanCopeland@fdlrez.com>; Elise Larson <el Larson@mncenter.org>; Kevin Reuther <kreuther@mncenter.org>; dporetti@nilanjohnson.com; Margo Brownell <Margo.Brownell@maslon.com>; Brita Larsen <BBLarsen@hollandhart.com>
Subject: RE: MPCA - Forensic Search Privilege Log Documents

Yes you are correct that there are two different set of data. Currently we are exporting 26,288 native documents along with metadata which represents the final document count of all the original data after deduplication, court ordered search terms applied and date filter applied. These documents were deduped against each other and not against the "Deleted and Recovered" data. We are currently still in the process of date filtering and applying the court ordered search terms to the "Deleted and Recovered" data which consists of 111,808 documents. Once we have applied the date filter and terms to this data set we will run a custom deduplication of the remaining documents against the 26,288 and exclude any 100% duplicate documents from the packaging of the "Deleted and Recovered" data.

Mike Gallegos | Director, eDiscovery Sales
XACT DATA DISCOVERY

T | 801.851.5284
C | 385.226.2452

30 E. Broadway Suite 300
Salt Lake City, UT 84111

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taken reasonable precautions to ensure no viruses are present in this email, the company cannot accept responsibility for any loss or damage arising from the use of this email or attachments.

From: Evan Nelson <Evan.Nelson@maslon.com>
Sent: Monday, December 23, 2019 3:29 PM
To: Mike Gallegos <mgallegos@xactdatadiscovery.com>; Alison C. Hunter <ACHunter@hollandhart.com>
Cc: Susan M. Mathiascheck <SMMathiascheck@hollandhart.com>; John C. Martin <JCMartin@hollandhart.com>; Schwartz, Rich <RSchwartz@crowell.com>; Maureen R. Witt <MWitt@hollandhart.com>; Paula Maccabee <pmaccabee@justchangelaw.com>; Vanessa Ray-Hodge <vrayhodge@abqsonosky.com>; Matt Murdock <MMURDOCK@sonosky.com>; Sean Copeland <SeanCopeland@fdlrez.com>; Elise Larson <el Larson@mncenter.org>; Kevin Reuther <kreuther@mncenter.org>; dporetti@nilanjohnson.com; Margo Brownell <Margo.Brownell@maslon.com>; Brita Larsen <BBLarsen@hollandhart.com>
Subject: RE: MPCA - Forensic Search Privilege Log Documents

Mike,

Thank you for your email. From the below, it appears that there are two categories of data – 1) documents that had not been deleted, and 2) documents that had been deleted. Xact has de-duplicated documents within these groups, in other words, if a non-deleted document was 100% identical to some other non-deleted document, it was not loaded into Relativity. After de-duplication, there are 102,937 documents that were recovered as deleted data and 61,480 documents recovered as non-deleted data. Xact has run search terms on the non-deleted data, but has not run search terms on the deleted data.

Please confirm if my understanding is correct, or correct where I am mistaken.

Thanks,
Evan

EVAN A. NELSON | ATTORNEY
p 612.672.8396
MASLON LLP
3300 Wells Fargo Center, 90 South Seventh Street, Minneapolis, MN 55402

From: Mike Gallegos <mgallegos@xactdatadiscovery.com>
Sent: Monday, December 23, 2019 12:47 PM
To: Alison C. Hunter <ACHunter@hollandhart.com>
Cc: Susan M. Mathiascheck <SMMathiascheck@hollandhart.com>; John C. Martin <JCMartin@hollandhart.com>; Schwartz, Rich <RSchwartz@crowell.com>; Maureen R. Witt <MWitt@hollandhart.com>; Paula Maccabee <pmaccabee@justchangelaw.com>; Vanessa Ray-Hodge <vrayhodge@abqsonosky.com>; Matt Murdock <MMURDOCK@sonosky.com>; Sean Copeland <SeanCopeland@fdlrez.com>; Elise Larson <el Larson@mncenter.org>; Kevin Reuther <kreuther@mncenter.org>; dporetti@nilanjohnson.com; Margo Brownell <Margo.Brownell@maslon.com>; Evan Nelson <Evan.Nelson@maslon.com>; Brita Larsen <BBLarsen@hollandhart.com>
Subject: RE: MPCA - Forensic Search Privilege Log Documents

Alison,

Attached are the search reports for the previously processed data that we ran the Court Ordered Search terms across.

The final numbers once the documents are deduped are as follow, these are what we loaded into a new Relativity Database.

Pre De-dupe	Post De-dupe	Dupe removed	Post dedupe Query Size(GB)
71418	61480	9938	17.33

This data is currently live. Can you please let me know who should have access to this database?

Below are the numbers for the recovered deleted data, this is before any search terms are applied. We will send the metrics on search hits as soon as they are available.

Pre Dedupe	Post Dedupe	Dupes Removed	Post Dedupe Query Size(GB)
111,808	102,937	8,871	14.69

FYI - There is no deletion date metadata available for this data.

Thanks
Mike

Mike Gallegos | Director, eDiscovery Sales
XACT DATA DISCOVERY

T| 801.851.5284
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30 E. Broadway Suite 300
Salt Lake City, UT 84111

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From: Mike Gallegos

Sent: Saturday, December 21, 2019 10:07 AM

To: Alison C. Hunter <ACHunter@hollandhart.com>

Cc: Susan M. Mathiascheck <SMMathiascheck@hollandhart.com>; John C. Martin <JCMartin@hollandhart.com>; Schwartz, Rich <RSchwartz@crowell.com>; Maureen R. Witt <MWitt@hollandhart.com>; Paula Maccabee <pmaccabee@justchangelaw.com>; Vanessa Ray-Hodge <vrayhodge@abqsonosky.com>; Matt Murdock <MMURDOCK@sonosky.com>; Sean Copeland <SeanCopeland@fdlrez.com>; Elise Larson <elarson@mncenter.org>; Kevin Reuther

<kreuther@mncenter.org>; dporetti@nilanjohnson.com; Margo Brownell
<Margo.Brownell@maslon.com>; Evan Nelson <Evan.Nelson@maslon.com>; Brita Larsen
<BBLarsen@hollandhart.com>

Subject: RE: MPCA - Forensic Search Privilege Log Documents

Alison,

Let me know if you will be able to send the privilege log in Excel format. That will be extremely helpful.

Below is a summary of the next steps on the XDD side:

1. XDD will run the court ordered search terms on the active data, which has already been processed.
2. XDD will load the results of this search to a new Relativity database and for review by the H&H team.
3. Concurrently with 1 and 2 above, XDD forensics team will work to collect any deleted files from the collected hard drives.
4. XDD will process, dedupe, OCR and then run the court ordered search terms on the recovered data.
5. XDD will load the results of this search to Relativity and for review by the H&H team.
6. XDD will create the production by Jan. 7, 2020. Exact timing of the release of documents for production by H&H will be dependent on the number of documents and the production format, but will be no later than Jan. 5, 2020 (noting a large number of docs produced in searchable PDF format will require extra time).

Please confirm that MPCA/H&H will handle gathering any communications between XDD and MPCA.

Thanks
Mike

From: Mike Gallegos <mgallegos@xactdatadiscovery.com>

Sent: Friday, December 20, 2019 7:15 PM

To: Alison C. Hunter <ACHunter@hollandhart.com>

Cc: Susan M. Mathiascheck <SMMathiascheck@hollandhart.com>; John C. Martin <JCMartin@hollandhart.com>; Schwartz, Rich <RSchwartz@crowell.com>; Maureen R. Witt <MWitt@hollandhart.com>; Paula Maccabee <pmaccabee@justchangelaw.com>; Vanessa Ray-Hodge <vrayhodge@abqsonosky.com>; Matt Murdock <MMURDOCK@sonosky.com>; Sean Copeland <SeanCopeland@fdlrez.com>; Elise Larson <elarson@mncenter.org>; Kevin Reuther <kreuther@mncenter.org>; dporetti@nilanjohnson.com; Margo Brownell <Margo.Brownell@maslon.com>; Evan Nelson <Evan.Nelson@maslon.com>; Brita Larsen <BBLarsen@hollandhart.com>

Subject: Re: MPCA - Forensic Search Privilege Log Documents

Do you have this in Excel format?

On Dec 20, 2019, at 4:55 PM, Alison C. Hunter <ACHunter@hollandhart.com> wrote:

Mike,

Attached please find the complete forensic search privilege log with the document IDs. This has more documents than those Relators are challenging, but Xact should be able to pull the document IDs for the documents Relators identified from the attached.

In regard to providing the documents for our review, we would prefer that you send them to us (myself and Brita) by native export as you proposed. Please also disable any logins that would allow us to access Xact's Relativity database.

Thank you,
Alison

<image001.png>

Alison Hunter

Associate, Holland & Hart LLP
800 W. Main Street, Suite 1750, Boise ID 83702
T 208.383.3985 F 208.392.1636

<image002.png>

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From: Mike Gallegos <mgallegos@xactdatadiscovery.com>
Sent: Friday, December 20, 2019 4:12 PM
To: Alison C. Hunter <ACHunter@hollandhart.com>
Cc: Susan M. Mathiascheck <SMMathiascheck@hollandhart.com>; John C. Martin <JCMartin@hollandhart.com>; 'Schwartz, Rich' <RSchwartz@crowell.com>; Maureen R. Witt <MWitt@hollandhart.com>; 'Paula Maccabee' <pmaccabee@justchangelaw.com>; 'Vanessa Ray-Hodge' <vrayhodge@abqsonosky.com>; 'Matt Murdock' <MMURDOCK@sonosky.com>; 'Sean Copeland' <SeanCopeland@fdlrez.com>; 'Elise Larson' <elaron@mncenter.org>; 'Kevin Reuther' <kreuther@mncenter.org>; 'dporetti@nilanjohnson.com' <dporetti@nilanjohnson.com>; Margo Brownell <Margo.Brownell@maslon.com>; Evan Nelson <Evan.Nelson@maslon.com>; Brita Larsen <BBLarsen@hollandhart.com>
Subject: RE: MPCA - Forensic Search Privilege Log Documents

External Email

Alison,

Can you provide us with the document IDs for the documents identified on the privilege log? We can then set up a saved search with just those privileged documents within the Relativity workspace. You could view them in the Relativity or we could do a native export of those documents and send them to Holland & Hart.

Mike

Mike Gallegos | Director, eDiscovery Sales
XACT DATA DISCOVERY

T | 801.851.5284

C| 385.226.2452

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From: Mike Gallegos
Sent: Friday, December 20, 2019 2:49 PM
To: 'Alison C. Hunter' <ACHunter@hollandhart.com>
Cc: Susan M. Mathiascheck <SMMathiascheck@hollandhart.com>; John C. Martin <JCMartin@hollandhart.com>; 'Schwartz, Rich' <RSchwartz@crowell.com>; Maureen R. Witt <MWitt@hollandhart.com>; 'Paula Maccabee' <pmaccabee@justchangelaw.com>; 'Vanessa Ray-Hodge' <vrayhodge@abqsonosky.com>; 'Matt Murdock' <MMURDOCK@sonosky.com>; 'Sean Copeland' <SeanCopeland@fdlrez.com>; 'Elise Larson' <elarson@mncenter.org>; 'Kevin Reuther' <kreuther@mncenter.org>; 'dporetti@nilanjohnson.com' <dporetti@nilanjohnson.com>; Margo Brownell <Margo.Brownell@maslon.com>; Evan Nelson <Evan.Nelson@maslon.com>; Brita Larsen <BBLarsen@hollandhart.com>
Subject: RE: MPCA - Forensic Search Privilege Log Documents

Understood.

Mike

From: Alison C. Hunter <ACHunter@hollandhart.com>
Sent: Friday, December 20, 2019 11:05 AM
To: Mike Gallegos <mgallegos@xactdatadiscovery.com>
Cc: Susan M. Mathiascheck <SMMathiascheck@hollandhart.com>; John C. Martin <JCMartin@hollandhart.com>; 'Schwartz, Rich' <RSchwartz@crowell.com>; Maureen R. Witt <MWitt@hollandhart.com>; 'Paula Maccabee' <pmaccabee@justchangelaw.com>; 'Vanessa Ray-Hodge' <vrayhodge@abqsonosky.com>; 'Matt Murdock' <MMURDOCK@sonosky.com>; 'Sean Copeland' <SeanCopeland@fdlrez.com>; 'Elise Larson' <elarson@mncenter.org>; 'Kevin Reuther' <kreuther@mncenter.org>; 'dporetti@nilanjohnson.com' <dporetti@nilanjohnson.com>; Margo Brownell <Margo.Brownell@maslon.com>; Evan Nelson <Evan.Nelson@maslon.com>; Brita Larsen <BBLarsen@hollandhart.com>
Subject: RE: MPCA - Forensic Search Privilege Log Documents

Mike,

As a follow up and clarification of my last email, the cover email transmitting the documents should only be to Holland & Hart and should not include Relators

counsel. After the transmittal to Holland & Hart is made, we would ask that Xact send a pdf of just the transmittal cover email to all parties copied on this email.

Thank you,
Alison

<image001.png>

Alison Hunter

Associate, Holland & Hart LLP
800 W. Main Street, Suite 1750, Boise ID 83702
T 208.383.3985 F 208.392.1636

<image002.png>

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From: Alison C. Hunter

Sent: Friday, December 20, 2019 10:50 AM

To: 'Mike Gallegos' <mgallegos@xactdatadiscovery.com>

Cc: Susan M. Mathiascheck <SMMathiascheck@hollandhart.com>; John C. Martin <JCMartin@hollandhart.com>; 'Schwartz, Rich' <RSchwartz@crowell.com>; Maureen R. Witt <MWitt@hollandhart.com>; 'Paula Maccabee' <pmaccabee@justchangelaw.com>; 'Vanessa Ray-Hodge' <vrayhodge@abqsonosky.com>; 'Matt Murdock' <MMURDOCK@sonosky.com>; 'Sean Copeland' <SeanCopeland@fdlrez.com>; 'Elise Larson' <el Larson@mncenter.org>; 'Kevin Reuther' <kreuther@mncenter.org>; 'dporetti@nilanjohnson.com' <dporetti@nilanjohnson.com>; Margo Brownell <Margo.Brownell@maslon.com>; Evan Nelson <Evan.Nelson@maslon.com>; Brita Larsen <BBLarsen@hollandhart.com>

Subject: MPCA - Forensic Search Privilege Log Documents

Mike,

MPCA has received a request from Relators to conduct a meet-and-confer regarding documents that are on the Privilege Log prepared for the forensic search Xact performed and produced documents from on December 16, 2019. In order to comply with the Court's December 19, 2019 Order (attached in my last email), the parties have agreed, and the court has authorized, Xact to provide the privileged documents identified in the attached spreadsheet just to Holland & Hart. We would defer to you on the best way to transmit the privileged documents identified in the attached spreadsheet to Holland & Hart.

Please let us know if you have any questions.

Thank you,
Alison

<image001.png>

Alison Hunter

Associate, Holland & Hart LLP
800 W. Main Street, Suite 1750, Boise ID 83702
T 208.383.3985 F 208.392.1636

<image002.png>

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<2019-12-16 Supplemental Privilege Log of Forensically Captured Data w-
Control Nos.pdf>

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From: [Mike Gallegos](#)
To: [Brita Larsen](#); [Alison C. Hunter](#)
Subject: MPCA - Forensic Search Privilege Log Documents ((33550-9) Delivery Notification
Date: Friday, December 27, 2019 9:43:57 AM

Alison and Brita,

You can download the MPCA privilege export from the following link. I will send you the password in a separate email.

UPLOADED FILES:

Filename	Size	Checksum (SHA256)
Priv- Export_001.zip	36.6 MB	7c43fcba0065164d47b5633b01677524728f48656ac835962db6646ce314ce1a

Please click on the following link to download the files:

<https://upload.xactdatadiscovery.com/message/rOTiuGnsGrv0Bxnqc0phSG>

The files are available until: **Friday, January 3.**

Message ID: rOTiuGnsGrv0Bxnqc0phSG

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