UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN

In re) Chapter 9
CITY OF DETROIT, MICHIGAN,) Case No. 13-53846
Debtor.) Hon. Steven W. Rhodes

MOTION OF CREDITORS TO VIEW OR, IN THE ALTERNATIVE, UNSEAL SUPPLEMENTAL ORDER REGARDING MEDIATION CONFIDENTIALITY

The undersigned creditors (collectively, the "<u>Creditors</u>") respectfully submit this motion (this "<u>Motion</u>") to view or, in the alternative, unseal the the *Supplemental Order Regarding Mediation Confidentiality* [Docket No. 5294] (the "<u>Supplemental Order</u>") entered on June 12, 2014. In support of this Motion, the Creditors respectfully state as follows:

Preliminary Statement

- 1. On June 12, this Court entered an amendment or supplement to its original mediation order in the form of the Supplemental Order. The Creditors have not been provided with a copy of the Supplemental Order.
- 2. While the Creditors are mindful that certain sensitive information regarding this case's mediation process may be protected from third parties not subject to the confidentiality obligations under the mediation order, the order

itself—together with its amendments, supplements, or subsequent versions—must be viewable at least by the mediation parties.

- 3. The Creditors, in particular, should be permitted to view the Supplemental Order for two reasons:
 - *First*, the Creditors are mediation parties bound by the Court's original mediation order (as may be amended, revised, or supplemented). In order to know what rights and obligations they may have as mediation parties—and to avoid any inadvertent waiver of their rights or failure to satisfy their obligations—the Creditors should be permitted to view the recently entered amendment or supplement.
 - Second, other parties in this case, including the City, have recently asserted the "mediation privilege" to avoid responding to certain of the Creditors' discovery requests and subpoenas. To understand whether any claimed privilege is valid and applicable and to determine how to respond, the Creditors must first understand the parameters of and the terms governing the mediation.
- 4. The transparency of the chapter 9 plan process is critical to ensure parties' rights are protected as the Court considers confirmation of the City's plan. The Creditors therefore respectfully request that they be permitted to view the

mediation order in its entirety, including the Supplemental Order, either on a confidential basis or, in the alternative, in connection with it being unsealed (if appropriate).

Jurisdiction and Venue

5. The Court has jurisdiction over the Motion pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b) and venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

Relief Requested

6. By this Motion, the Creditors respectfully request to view the sealed Supplemental Order or, in the alternative and to the extent appropriate, that the Supplemental Order be unsealed.

Background

- 7. On August 13, 2013, this Court entered an order [Docket No. 322] (the "Original Mediation Order" and, as amended or supplemented, the "Mediation Order") directing parties to submit to mediation. The Original Mediation Order states that "[a]ll proceedings, discussions, negotiation, and writings incident to mediation shall be privileged and confidential, and shall not be disclosed, filed or placed in evidence." Original Mediation Order at 1.
- 8. On August 20, 2013 and September 3, 2013, the Court ordered the Creditors to submit to mediation under the Original Mediation Order [Docket Nos.

527, 704]. As a result, the Creditors are bound by the Original Mediation Order, including to the extent it is amended or supplemented by the Supplemental Order.

9. On June 12, 2014, this Court entered the Supplemental Order. Based on its title, the Supplemental Order appears to relate to "mediation confidentiality" but does not elaborate on its contents. The Creditors have not been provided with the Supplemental Order and could not obtain a copy through informal requests. As a result, the Creditors file this Motion.

Basis for Relief

- I. The Creditors Should Be Allowed to View the Supplemental Order to Know Their Rights and Obligations as Mediation Parties.
- 10. As parties to the mediation in this case, the Creditors are bound by the Original Mediation Order—as it was originally entered and as it may be amended and supplemented. This Court's sealed Supplemental Order appears, at a minimum, to supplement the Original Mediation Order (and also may amend it—there is no way for the Creditors to know).
- 11. Without viewing the Supplemental Order, the Creditors cannot know what their potential legal rights and obligations may be. Because the Creditors are mediation parties presumably bound by the Supplemental Order, the Creditors should be entitled to know what the Supplemental Order says.

II. The Creditors Should Be Allowed to View the Supplemental Order to Understand the Parameters of the Mediation Privilege (If Any).

- 12. As noted above, the City and other parties in this case have asserted the "mediation privilege" to avoid providing information requested in the Creditors' discovery requests and subpoenas. See, e.g., Joint Motion to Quash at 10–11 [Docket No. 5300]; Transcript of Hearing at 267–68 (May 28, 2014); State of Michigan Privilege Log (attached hereto as Exhibit 6); State of Michigan's Response to Syncora's Subpoena Duces Tecum at 2 [Docket No. 3315]; City of Detroit's Objections and Responses to Syncora Capital Assurance Inc. and Syncora Guarantee Inc.'s First Request for the Production of Documents at 2 [Docket No. 4479]. In fact, the so-called mediation privilege was asserted against certain of the Creditors' discovery requests as recently as just last week (after entry of the Supplemental Order). See Joint Motion to Quash at 10–11 [Docket No. 5300].
- 13. Without viewing the entire mediation order (i.e., the Original Mediation Order, as amended or supplemented by the Supplemental Order), the Creditors cannot understand the parameters of the mediation in this case. And without understanding the parameters of the mediation, the Creditors cannot determine whether claims of any privilege are valid and cannot decide whether or how best to respond to them. Accordingly, to facilitate an efficient discovery process and afford all parties (the Creditors and the privilege-claiming parties) with

the rights (if any) to which they are entitled, the Creditors should be permitted to view the Supplemental Order.

Conclusion

14. For the reasons stated herein, the Creditors respectfully request that the Court (a) permit the Creditors to view the Supplemental Order or (b) in the alternative and to the extent appropriate, unseal the Supplemental Order.

[Remainder of page intentionally left blank.]

Respectfully submitted, Dated: June 17, 2014

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Proposed Order

The Motion requests either of two alternative forms of relief. A proposed form of order will be provided promptly upon the Court's determination of which alternative relief (if any) to grant.

Exhibit 2 Notice of Motion and Opportunity to Object

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN

)
In re) Chapter 9
)
CITY OF DETROIT, MICHIGAN,) Case No. 13-53846
)
Debtor.) Hon. Steven W. Rhodes
)

NOTICE OF MOTION OF CREDITORS TO VIEW OR, IN THE ALTERNATIVE, UNSEAL SUPPLEMENTAL ORDER REGARDING MEDIATION CONFIDENTIALITY

PLEASE TAKE NOTICE that on June 17, 2014, Syncora filed the Motion of Creditors to View Or, in the Alternative, Unseal Supplemental Order Regarding Mediation Confidentiality (the "Motion") in the United States Bankruptcy Court for the Eastern District of Michigan (the "Bankruptcy Court") seeking to allow the Creditors to view or, in the alternative, unseal the the Supplemental Order Regarding Mediation Confidentiality [Docket No. 5294] entered on June 12, 2014.

PLEASE TAKE FURTHER NOTICE that your rights may be affected by the relief sought in the Motion. You should read these papers carefully and discuss them with your attorney, if you have one. If you do not have an attorney, you may wish to consult one.

PLEASE TAKE FURTHER NOTICE that if you do not want the Bankruptcy Court to grant the Motion or you want the Bankruptcy Court to consider your views on the Motion, by July 1, 2014, you or your attorney must:

1. File with the Bankruptcy Court a written response to the Motion, explaining your position, electronically through the Bankruptcy Court's electronic case filing system in accordance with the Local Rules of the Bankruptcy Court or by mailing any objection or response to:¹

United States Bankruptcy Court Theodore Levin Courthouse 231 West Lafayette Street Detroit, MI 48226

If you mail your response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above. All attorneys are required to file pleadings electronically.

You must also serve a copy of any objection or response upon:

James H.M. Sprayregen, P.C. Ryan Blaine Bennett Stephen C. Hackney KIRKLAND & ELLIS LLP 300 North LaSalle Chicago, Illinois 60654 Telephone: (312) 862-2000 Facsimile: (312) 862-2200

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If an objection or response is timely filed and served, the clerk will schedule a hearing on the Motion and you will be served with a notice of the date, time and location of the hearing.

¹ A response must comply with F. R. Civ. P. 8(b), (c) and (e).

PLEASE TAKE FURTHER NOTICE that if you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the Motion and may enter an order granting such relief.

Dated: June 17, 2014 /s/ Ryan Blaine Bennett

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Attorneys for Syncora Guarantee Inc. and Syncora Capital Assurance Inc.

None [Brief Not Required]

Certificate of Service [To be filed separately]

Affidavits [Not Applicable]

Documentary Exhibits [State of Michigan Privilege Log]

ivileged Bates Begin	Custodian	Email To	Email From	Email CC 4	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000001						Notes to House of Representative re Mediation	Mediation	Document/email discussing a subject incident to mediation
PRIV_000002	Brader, Valerie	Lukasz Paszek	Valerie Brader (GOV)		4/15/2014	RE: Estimated Retiree Stabilization Payments (including 20-year projections)	Common Interest Agreement	Document/email containing communication with attorney
PRIV_000003	Brader, Valerie	Calley, Brian (GOV)	Valerie Brader (GOV)	Muchmore, Dennis (GOV); Snyder, Rick (GOV); Baird, Richard (GOV); Gadola, Michael (GOV); Scott, Allison (GOV); Tedder, Greg (GOV)	3/4/2014	RE: CONFIDENTIAL AND SUBJECT TO ATTY CLIENT PRIVILEGE	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_00004	Brader, Valerie					Attachment: - Draft City of Detroit Post Bankruptcy Oversight	Mediation	Document/email discussing a subject incident to mediation
PRIV_000005	Brader, Valerie					Attachment: Preliminary Draft Discussion Draft Pension Restructuring Proposal	Mediation	Document/email discussing a subject incident to mediation
PRIV_000006	Brader, Valerie					Attachment: Treatment of Provisions for Classes of Creditors	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product, Document/email discussing a subject incident to mediation
PRIV_000007	Brader, Valerie					Attachment: PPT Slides for Presentation	Mediation	Document/email discussing a subject incident to mediation
PRIV_000008	Brader, Valerie				1/24/2014	Draft Senate /House Bill	Mediation	Document/email discussing a subject incident to mediation
PRIV_000009	Brader, Valerie	Snyder, Rick (GOV)	Brader, Valerie (GOV)	Scott, Allison (GOV); lukasz@paszek.com; Priest, Chris (GOV); Gadola, Michael (GOV)	2/21/2014	LowIncomeModel: Confidential - Subject to mediation order	Mediation	Document/email discussing a subject incident to mediation
PRIV_000010	Brader, Valerie	Agen, Jarrod (GOV) ; Priest, Chris (GOV)	Gadola, Michael (GOV)	Lukasz Paszek ; Tedder, Greg (GOV) ; Brader, Valerie (GOV)	3/3/2014	RE: blog post on POA	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000011	Brader, Valerie				1/21/2014	Draft 2 Detroit Settlement Conditions	Mediation	Document/email discussing a subject incident to mediation
PRIV_000012	Brader, Valerie				1/21/2014	Draft 2 Detroit Settlement Conditions	Mediation	Document/email discussing a subject incident to mediation
PRIV_000013	Brader, Valerie	Brock Swartzle'; Brader, Valerie (GOV); Schneider, Matthew (AG) Jennifer Dettloff	Gadola, Michael (GOV)	Brian Mills ; Scott Starr ; Travis Weber ; Tedder, Greg (GOV)	3/3/2014	RE: Detroit	Mediation	Document/email discussing a subject incident to mediation
PRIV_000014	Brader, Valerie	Gadola, Michael (GOV); Brader, Valerie (GOV); Schneider, Matthew (AG); Jennifer Dettloff	Brock Swartzle	Brian Mills ; Scott Starr ; Travis Weber ; Tedder, Greg (GOV)	3/3/2014	RE: Detroit	Mediation	Document/email discussing a subject incident to mediation
PRIV_000015	Brader, Valerie	Brock Swartzle	Schneider, Matthew (AG)	Gadola, Michael (GOV); Brader, Valerie (GOV); Jennifer Dettioff; Brian Mills; Scott Starr; Travis Weber; Tedder, Greg (GOV)	3/3/2014	Re: Detroit	Attorney Client Communication; Mediation	Document/email containing attorney work product
PRIV_000016	Brader, Valerie	Schneider, Matthew (AG)	Brock Swartzie	Gadola, Michael (GOV); Brader, Valerie (GOV); Jennifer Dettloff; Brian Mills; Scott Starr, Travis Weber; Tedder, Greg (GOV)	3/3/2014	Re: Detroit	Attorney Client Communication; Mediation	Document/email containing attorney work product
PRIV_000017	Brader, Valerie	Calley, Brian (GOV); Muchmore, Dennis (GOV)	Brader, Valerie (GOV)	Snyder, Rick (GOV); Baird, Richard (GOV); Gadola, Michael (GOV) >; Scott, Allison (GOV); Tedder, Greg (GOV)	3/4/2014	CONFIDENTIAL AND SUBJECT TO ATTY CLIENT PRIVILEGE	Attorney Client Communication; Mediation	Document/email containing communication with attorney
PRIV_000018	Brader, Valerie	Brader, Valerie (GOV)	Tedder, Greg (GOV)		3/4/2014	FW: Detroit	Attorney Client Communication; Mediation	Document/email containing communication with attorney
PRIV 000019	Brader, Valerie	Tedder, Greg (GOV)	Brader, Valerie (GOV)		3/4/2014	RE: Detroit	Mediation	
PRIV_000020	Brader, Valerie					Draft Disclosure Statement 36th District Court	Attorney Work Product; Mediation	Document/email containing attorney work product
PRIV_000021	Brader, Valerie	Schneider, Matthew (AG)	Gadola, Michael (GOV)	Brader, Valerie (GOV) ; Steven G. Howell	3/5/2014	Re: Foundations	Attorney Client Communication; Mediation	Document/email containing communication with attorney
PRIV_000022	Brader, Valerie					Draft Lazard Discussion Materials	Common Interest Agreement; Mediation	Document/email discussing a subject incident to mediation
PRIV_000023	Brader, Valerie	Gadola, Michael (GOV)	Schneider, Matthew (AG)	Brader, Valerie (GOV) ; Steven G. Howell	3/5/2014	Re: Foundations	Attorney Client Communication; Mediation	Document/email containing communication with attorney

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PRIV_000024	Brader, Valerie					Proposed Structure for Income Stabilization	Mediation	Document/email discussing a subject incident to mediation
PRIV_000025	Brader, Valerie	Steven G. Howell	Gordon, Robert D.	Gadola, Michael (GOV); Schneider, Matthew (AG); Brader, Valerie (GOV); Bradley A. Robins; Eric Mendelsohn; Turner, Joseph E., Jr.; Michael J. VanOverbeke; King, Ronald A.; Jochen Schmitz	3/6/2014	FW: Detroit Mediation: 3/5/14 Materials (CONFIDENTIAL - Subject to FRE 408)	Mediation	Document/email discussing a subject incident to mediation
PRIV_000026	Brader, Valerie				3/5/2014	Value Gap Considerations	Mediation	Document/email discussing a subject incident to mediation
PRIV_000027	Brader, Valerie	Gadola, Michael (GOV); Brader, Valerie (GOV); Schneider, Matthew (AG)	Steven G. Howell	Kester K. So; Peter H. Ellsworth; Dawn R. Copley; Allison R. Bach	3/7/2014	Conditions and Income Stabilization Payment	Attomey Client Communication; Mediation	Document/email containing communication with attorney
PRIV_000028	Brader, Valerie					Conditions to Contribution by SOM	Attorney Work Product; Mediation	Document/email discussing a subject incident to mediation
PRIV_000029	Brader, Valerie					Proposed Structure for Income Stabilization	Attorney Work Product; Mediation	Document/email discussing a subject incident to mediation
PRIV_000030	Brader, Valerie	Brader, Valerie (GOV)	Sarah Griffin	Evan Miller; Heather Lennox; David G. Heiman; Mary M Reil; sachs@millercanfield.com	3/7/2014	Public Plan Governance Memo and Selective Survey / Proposed Trust Agreement	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney
PRIV_000031	Brader, Valerie				3/7/2014	Memo to V. Brader re public retirement systems	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product
PRIV_000032	Brader, Valerie					Trust Agreement Police and Fire Retirement System	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing communication with attorney
PRIV_000033	Brader, Valerie					Public Plan Governance Memo and Selective Survey / Proposed Trust Agreement	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing communication with attorney
PRIV_000034	Brader, Valerie	Clinton, Kevin (TREASURY); Stibitz, Brom (Treasury); Saxton, Thomas (Treasury); Tedder, Greg (GOV); orrk@detroitmi.gov; mayss@detroitmi.gov; Bill Nowling; Gelisse, Ashley (TREASURY); Brader, Valerie (GOV); stacy Fox	Jeffrey B Ellman	Charles M.Moore ; gaurav.malhotra@ey.com; ken.buckfire@millerbuckfire.com; David G. Heiman ; Corinne Ball ; Heather Lennox ; Bruce Bennett	3/8/2014	City of Detroit Restructuring Weekly E-Mail Update	Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product
PRIV_000035	Brader, Valerie				1/30/2014	Draft 2 Senate House Bill	Mediation	Document/email discussing a subject incident to mediation
PRIV_000036	Brader, Valerie	Brader, Valerie (GOV)	Lukasz Paszek		3/11/2014	FW: Thoughts on pension fund returns and discount rates // Confidential - Subject to mediation order	Mediation	Document/email discussing a subject incident to mediation
PRIV_000037	Brader, Valerie	Steven G. Howell'; Brader, Valerie (GOV); Schneider, Matthew (AG)	Gadola, Michael (GOV)	Kester K. So; Peter H. Ellsworth; Dawn R. Copley; Allison R. Bach	3/11/2014	RE: Conditions and Income Stabilization Payment	Attorney Client Communication; Mediation	Document/email containing communication with attorney
PRIV_000038	Brader, Valerie	Gadola, Michael (GOV); 'Steven G. Howell'; Schneider, Matthew (AG)	Brader, Valerie (GOV)	Kester K. So; Peter H. Ellsworth; Dawn R. Copley; Allison R. Bach	3/11/2014	RE: Conditions and Income Stabilization Payment	Attorney Client Communication; Mediation	Document/email containing communication with attorney
PRIV_000039	Brader, Valerie	Gadola, Michael (GOV); Brader, Valerie (GOV); Schneider, Matthew (AG)	Steven G. Howell	Kester K. So; Peter H. Ellsworth; Dawn R. Copley; Allison R. Bach	3/11/2014	RE: Conditions and Income Stabilization Payment	Attorney Client Communication; Mediation	Document/email containing communication with attorney
PRIV_000040	Brader, Valerie		•			Conditions to Contribution by SOM	Attorney Work Product; Mediation	Document/email containing attorney work product
PRIV_000041	Brader, Valerie			<u> </u>		Proposed Structure for Income Stabilization	Attorney Work Product; Mediation	Document/email containing attorney work product
PRIV_000042	Brader, Valerie	1				MERS Return Comparison	Attorney Work Product; Mediation	Document/email containing attorney work product
PRIV_000043	Brader, Valerie	Steven G. Howell	Schneider, Matthew (AG)	Gadola, Michael (GOV) ; Brader, Valerie (GOV) ; Kester K. So ; Peter H. Ellsworth ; Dawn R. Copley ; Allison R. Bach	3/11/2014	Re: Conditions and Income Stabilization Payment	Attorney Client Communication; Mediation	Document/email containing attorney work product

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PRIV_000044	Brader, Valerie	Gadola, Michael (GOV); Brader, Valerie; Schneider, Matthew (AG)	Steven G. Howell	Kester K. So; Peter H. Ellsworth; Dawn R. Copley; Allison R. Bach	3/11/2014	RE: Conditions and Income Stabilization Payment	Attorney Client Communication; Mediation	Document/email containing attorney work product
PRIV_000045	Brader, Valerie	Schneider, Matthew (AG) : Steven G. Howell	Gadola, Michael (GOV)	Brader, Valerie (GOV); Kester K. So; Peter H. Ellsworth; Dawn R. Copley; Allison R. Bach	3/11/2014	RE: Conditions and Income Stabilization Payment	Attorney Client Communication; Mediation	Document/email containing attorney work product
PRIV_000046	Brader, Valerie					MPSERS Returns	Mediation	Document/email discussing a subject incident to mediation
PRIV_000047	Brader, Valerie					Conditions to Contribution by SOM	Mediation	Document/email discussing a subject incident to mediation
PRIV_000048	Brader, Valerie	Brader, Valerie (GOV) ; Schneider, Matthew (AG) ; Steven G. Howell; Clinton, Kevin (TREASURY)	Gadola, Michael (GOV)	Lukasz Paszek ; Chris DeRose); Stoddard, Phil (DTMB)	3/12/2014	RE: CONFIDENTIAL AND SUBJECT TO MEDIATION ORDER – Discount Rate Backgrounder	Attorney Client Communication; Mediation	Document/email discussing a subject incident to mediation
PRIV_000049	Brader, Valerie	Steven G. Howell'	Gadola, Michael (GOV)	Schneider, Matthew (AG) ; Brader, Valerie (GOV)	3/12/2014	RE: Prior to the Foundation Call	Attorney Client Communication; Mediation	Document/email containing communication with attorney
PRIV_000050	Brader, Valerie	Gadola, Michael (GOV) ; Brader, Valerie (GOV) ; Schneider, Matthew (AG)	Steven G. Howell	Kester K. So ; Peter H. Ellsworth ; Dawn R. Copley ; Allison R. Bach	3/13/2014	Conditions & Exhibits 1 and 3	Attorney Client Communication; Mediation	Document/email containing communication with attorney
PRIV_000051	Brader, Valerie	Heather Lennox	Gadola, Michael (GOV)	Brader, Valerie (GOV) ; Steven G. Howell ; Schneider, Matthew (AG)	3/14/2014	Conditions	Attomey Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000052	Brader, Valerie					Exhibit 1 to Conditions to Contributions by SOM	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product
PRIV_000053	Brader, Valerie					Exhibit 3 to Conditions to Contributions by SOM	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product
PRIV_000054	Brader, Valerie					Confidential Term Sheet for Mediators' Proposal	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product
PRIV_000055	Brader, Valerie					Confidential Term Sheet for Mediators' Proposal	Mediation	Document/email discussing a subject incident to mediation
PRIV_000056	Brader, Valerie	Brader, Valerie (GOV); Schneider, Matthew (AG); Steven G. Howell Kester K. So	Gadola, Michael (GOV)		3/17/2014	FW: Revised Term Sheet	Mediation	Document/email discussing a subject incident to mediation
PRIV_000057	Brader, Valerie	Heather Lennox	Brader, Valerie (GOV)	Steven G. Howell'	3/18/2014	Revenue sharing	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	
PRIV_000058	Brader, Valerie	Gadola, Michael (GOV)	Dawn R. Copley	Brader, Valerie (GOV); Schneider, Matthew (AG); Peter H. Ellsworth; Kester K. So; Steven G. Howell	3/18/2014	FW: 36th District Court: suggested revisions to Disclosure Statement and Plan of Adjustment	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	
PRIV_000059	Brader, Valerie					Draft Disclosure Statement 36th District Court	Common Interest Agreement	
PRIV_000060	Brader, Valerie	Brader, Valerie (GOV)	Heather Lennox	David G. Heiman ; Evan Miller ; Gadola, Michael (GOV) ; Schneider, Matthew (AG) ; Steven G. Howell	3/18/2014	RE: Conditions	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	
PRIV_000061	Brader, Valerie	Gadola, Michael (GOV) ; Brader, Valerie (GOV)	Brock Swartzle	Brian Mills ; Travis Weber	3/20/2014	Bankruptcy	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000062	Brader, Valerie	Gadola, Michael (GOV)	Brader, Valerie (GOV)		3/20/2014	FW: Plain Language Insert	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	Document/email containing communication with attorney
PRIV_000063	Brader, Valerie				3/19/2014	Jones Day Draft Notice re: Proposed HealthCare Benefits	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product; Document/email containing communication with attorney
PRIV_000064	Brader, Valerie	Priest, Chris (GOV)	Brader, Valerie (GOV)	Lukasz Paszek	4/11/2014	RE: Estimated Retiree Stabilization Payments (including 20-year projections)	Attorney Client Communication; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject 5	Privilege Type	Privilege Descriptions
PRIV_000065	Brader, Valerie	Kevyn Orr ; Allison R. Bach >; Dawn R. Copley ; 'Steven G. Howell' ; Mary M Reil ; Sarah Griffin ; Gadola, Michael (GOV) ; Priest, Chris (GOV) ; lukasz@paszek.com	Brader, Valerie (GOV)	Evan Miller; Heather Lennox; Kenneth Sachs; Amanda Van Dusen	4/11/2014	RE: Revised IS terms	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000066	Brader, Valerie	Hanley, Farah (DTMB)	Priest, Chris (GOV)	Lukasz Paszek ; Brader, Valerie (GOV)	2/4/2014	Subject to Mediation Order: Estimate of Cost Savings	Mediation	Document/email discussing a subject incident to mediation
PRIV_000067	Brader, Valerie				1/24/2014	Estimate of Straight Cut Decrease	Mediation	Document/email discussing a subject incident to mediation
PRIV_000068	Brader, Valene	Clinton, Kevin (TREASURY); Stibitz, Brom (Treasury); Saxton, Thomas (Treasury); Tedder, Greg (GOV); orrk@detroitmi.gov; mayss@detroitmi.gov; Bill Nowling; Gelisse, Ashley (TREASURY); Brader, Valerie (GOV); stacy Fox	Jeffrey B Ellman	Charles M.Moore; gaurav.malhotra@ey.com; ken.buckfire@millerbuckfire.com; David G. Heiman; Corinne Ball; Heather Lennox; Bruce Bennett	2/7/2014	City of Detroit Restructuring – Weekly E-Mail Update	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	
PRIV_000069	Brader, Valerie	Brader, Valerie (GOV)	Gadola, Michael (GOV)		2/13/2014	FW: Mediators' Response	Mediation	Document/email discussing a subject incident to mediation
PRIV_000070	Brader, Valerie				2/10/2014	Memo to State Representatives re Mediator's Response	Mediation	Document/email discussing a subject incident to mediation
PRIV_000071	Brader, Valerie	Brader, Valerie (GOV)	Heather Lennox		9/13/2013	RE: *Confidential: Confidential: Discussion Draft of Articles of Incorporation	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email containing communication with attorney
PRIV_000072	Brader, Valerie	Brian L. Sedlak'	Steven G. Howell	Heather Lennox ; Brader, Valerie (GOV) ; Gadola, Michael (GOV) ; Schneider, Matthew (AG)	2/28/2014	RE: DIA Term Sheet	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000073	Brader, Valerie				2/27/2014	Jones Day Comments to Mediator's Proposal	Mediation	
PRIV_000074	Brader, Valerie				2/27/2014	Confidential Term Sheet for Mediators' Proposal	Mediation	
PRIV_000075	Brader, Valerie	Brader, Valerie (GOV)	West, Samantha (GOV)		3/17/2014	FW: LowIncomeModel: Confidential - Subject to mediation order	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000076	Brader, Valerie	Steven G. Howell ; Brader, Valerie (GOV)	Heather Lennox		3/20/2014	Fw: Plain Language Insert	Common Interest Agreement; Attorney Work Product	
PRIV_000077	Brader, Valerie					Conditions to Contribution by SOM	Attorney Work Product; Mediation	Document/email discussing a subject incident to mediation
PRIV_000078	Brader, Valerie	Gadola, Michael (GOV) >; Brader, Valerie (GOV)	West, Samantha (GOV)		3/21/2014	RE: File - DETROIT-#1309357-v5- Confidential_Conditions_to_Contribution_by_State_o f_Michigan-3.doc	Attorney Client Communication; Attorney Work Product; Mediation	Document/email discussing a subject incident to mediation
PRIV_000079	Brader, Valerie					Conditions to Contribution by SOM	Attorney Work Product; Mediation	Document/email discussing a subject incident to mediation
PRIV_000080	Brader, Valerie	Brader, Valerie (GOV) ; SHewell@dickinson-wright.com	Heather Lennox		3/21/2014	Fw: CONFIDENTIAL: Draft Solicitation Documents	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product; Document/email containing communication with attorney
PRIV_000081	Brader, Valerie					Upon further review, this document should not have been included with privilege log. It is nonresponsive	Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product
PRIV_000082	Brader, Valerie				3/21/2014	Jones Day Draft Notice re: Proposed HealthCare Benefits	Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product
PRIV_000083	Brader, Valerie					Pension/OPEB Tabulation Rules	Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product

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PRIV_000084	Brader, Valerie					Upon further review, this document should not have been included with privilege log. It is nonresponsive	Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product
PRIV_000085	Brader, Valerie					Upon further review, this document should not have been included with privilege log. It is nonresponsive	Common Interest Agreement	
PRIV_000086	Brader, Valerie					Proposed Ballot	Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product
PRIV_000087	Brader, Valerie					Proposed Ballot	Common Interest Agreement; Attorney Work Product	
PRIV_000088	Brader, Valerie					Proposed Ballot	Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product
PRIV_000089	Brader, Valerie					Draft ELB Order	Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product
PRIV_000090	Brader, Valerie	Gerald Rosen; Edriker	Gadola, Michael (GOV)	Brader, Valerie (GOV) ; Steven G. Howell	3/21/2014	Revised conditions	Attorney Work Product; Mediation	Document/email containing attorney work product Document/email discussing a subject incident to mediation
PRIV_000091	Brader, Valerie					Conditions to Contribution by SOM	Attorney Work Product; Mediation	Document/email containing attorney work product Document/email discussing a subject incident to mediation
PRIV_000092	Brader, Valerie	Brader, Valerie (GOV)	Elsenheimer, Kevin (LARA)		3/21/2014	Fwd: Letter	Mediation	
PRIV_000093	Brader, Valerie	Brader, Valerie (GOV)	EDriker	Gerald Rosen ; Gadola, Michael (GOV)	3/21/2014	Re: LowIncomeModel: Confidential - Subject to mediation order	Mediation	Document/email discussing a subject incident to mediation
PRIV_000094	Brader, Valerie	Brader, Valerie (GOV)	Steven G. Howeli		3/22/2014	RE: LowIncomeModel: Confidential - Subject to mediation order	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000095	Brader, Valerie	Brader, Valerie (GOV)	Steven G. Howell		3/22/2014	RE: LowIncomeModel: Confidential - Subject to mediation order	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000096	Brader, Valerie	Schneider, Matthew (AG); Flancher, Steven (AG); Gadola, Michael (GOV); Brader, Valerie (GOV)	Dawn R. Copley	Steven G. Howell ; Peter H. Ellsworth ; Kester K. So ; Allison R. Bach	3/22/2014	Comments to Disclosure Statement	Attorney Client Communication; Attorney Work Product	Document/email containing attorney work product Document/email containing communication with attorney
PRIV_000097	Brader, Valerie	Clinton, Kevin (TREASURY); Stibitz, Brom (Treasury); Saxton, Thomas (Treasury); Tedder, Greg (GOV); orrk@detroitmi.gov; mayss@detroitmi.gov; Bill Nowling; Gelisse, Ashley (TREASURY) >; Brader, Valerie (GOV); stacy Fox	Jeffrey B Ellman	Charles M.Moore ; gaurav.malhotra@ey.com; ken.buckfire@millerbuckfire.com; David G. Heiman ; Corinne Ball ; Heather Lennox ; Bruce Bennett	3/23/2014	City of Detroit Restructuring Weekly E-Mail Update	Attomey Client Communication; Common Interest Agreement; Attomey Work Product	Document/email containing attorney work product Document/email containing communication with attorney
PRIV_000098	Brader, Valerie	Brader, Valerie (GOV)	EDriker	GadolaM@jud.state.mi.us; Gerald E. Rosen ; Victoria_Roberts; EDriker	3/25/2014	Negotiations with Don Taylor	Mediation	Document/email discussing a subject incident to mediation
PRIV_000099	Brader, Valerie	Brader, Valerie (GOV)	EDriker		3/25/2014	Re: Negotiations with Don Taylor	Mediation	Document/email discussing a subject incident to mediation
PRIV_000100	Brader, Valerie	Brader, Valerie (GOV)	Gaurav.Maihotra@ey.com	Отг, Kevyn; David G. Heiman ; hlennox@jonesday.com	3/25/2014	Draft 40 Year projections	Attorney Client Communication; Common Interest Agreement	Document/email containing communication with attorney
PRIV_000101	Brader, Valerie				2/24/2014	Draft POA 40 Year projections	Mediation	Document/email discussing a subject incident to mediation
PRIV_000102	Brader, Valerie	Brader, Valerie (GOV)	EDriker		3/25/2014	Re: Negotiations with Don Taylor	Mediation	Document/email discussing a subject incident to mediation
PRIV_000103	Brader, Valerie	Brader, Valerie (GOV)	Brader, Valerie (GOV)	West, Samantha (GOV)	3/25/2014	FW: CONFIDENTIAL - Detroit - Draft Financial/Restructuring Analyses	Attorney Client Communication; Mediation	Document/email discussing a subject incident to mediation

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Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject 1	Privilege Type	Privilege Descriptions
PRIV_000104	Brader, Valerie				1/30/2014	Preliminary Draft City of Detroit Ten Year Plan	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product
PRIV_000105	Brader, Valerie	Gadola, Michael (GOV)	Muchmore, Dennis (GOV)	Brader, Valerie (GOV)	3/25/2014	Re: Negotiations with Don Taylor	Attorney Client Communication; Mediation	Document/email containing communication with attorney
PRIV_000106	Brader, Valerie	Brader, Valerie (GOV)	Victoria_Roberts	EDriker; Gerald_Rosen	3/25/2014	Re: Negotiations with Don Taylor	Attorney Client Communication; Mediation	Document/email containing communication with attorney
PRIV_000107	Brader, Valerie	Dawn R. Copley	Schneider, Matthew (AG)	Gadola, Michael (GOV); Brader, Valerie (GOV); Kester K. So; Peter H. Ellsworth; Steven G. Howell; Allison R. Bach	3/26/2014	Re: Potential pensioners claims against State	Attorney Client Communication; Mediation	Document/email containing communication with attorney
PRÍV_000108	Brader, Valerie	Schneider, Matthew (AG); Dawn R. Copley	Gadola, Michael (GOV)	Brader, Valerie (GOV); Kester K. So; Peter H. Ellsworth; Steven G. Howell; Allison R. Bach	3/26/2014	RE: Potential pensioners claims against State	Attorney Client Communication; Deliberative process	Document/email containing communication with attorney
PRIV_000109	Brader, Valerie	Brader, Valerie (GOV) <	Saxton, Thomas (Treasury)		3/26/2014	RE: CONFIDENTIAL AND SUBJECT TO MEDIATION ORDER UTGO settlement	Mediation	Document/email discussing a subject incident to mediation
PRIV_000110	Brader, Valerie	Gadola, Michael (GOV); Brader, Valerie (GOV)	Steven G. Howell		3/27/2014	Retiree Committee	Attorney Client Communication	Document/email containing communication with attorney
PRIV_000111	Brader, Valerie	Steven G. Howell'; Brader, Valerie (GOV)	Gadola, Michael (GOV)		3/27/2014	RE: Retiree Committee	Attorney Client Communication; Mediation	Document/email containing communication with attorney
PRIV_000112	Brader, Valerie	Brader, Valerie (GOV)	Gadola, Michael (GOV)	Steven G. Howell	3/27/2014	RE: Retiree Committee	Attorney Client Communication; Mediation	Document/email containing communication with attorney
PRIV_000113	Brader, Valerie	Brader, Valerie (GOV); Gadola, Michael (GOV); Schneider, Matthew (AG); Flancher, Steven (AG)	Steven G. Howell	Peter H. Ellsworth ; Kester K. So ; Dawn R. Copley	3/27/2014	Release	Attorney Work Product; Mediation	Document/email containing attorney work product
PRIV_000114	Brader, Valerie				3/26/2014	State's Proposal for Structure of Release	Attorney Work Product; Mediation	Document/email containing attorney work product
PRIV_000115	Brader, Valerie	Steven G Howell ; Brader, Valerie (GOV)	Heather Lennox		3/28/2014	Fw: #22035825v3 <active> - Detroit - City Revised Draft UTGO Term Sheet 3/25- #22035825v4<active> - Detroit - City Revised Draft UTGO Term Sheet 3/25</active></active>	Attorney Work Product; Mediation	Document/email containing attorney work produc
PRIV_000116	Brader, Valerie				3/25/2014	Term Sheet for Plan Treatment of UTGO Bond Claims	Attorney Work Product; Mediation	Document/email containing attorney work produc
PRIV_000117	Brader, Valerie				3/25/2014	Draft Term Sheet Plan Treatment of UTGO Bond Claims	Attorney Work Product; Mediation	
PRIV_000118	Brader, Valerie	Brader, Valerie (GOV)	Steven G. Howell		3/28/2014	RE: TARP funds	Attorney Client Communication; Mediation	Document/email containing communication with attorney
PRIV_000119	Brader, Valerie	Brader, Valerie (GOV)	Steven G. Howeli		3/28/2014	RE: TARP funds	Attorney Client Communication; Mediation	Document/email containing communication with attorney
PRIV_000120	Brader, Valerie	Brader, Valerie (GOV)	Steven G. Howell		3/28/2014	Release/Income Stabilization	Attorney Client Communication; Mediation	Document/email containing communication with attorney
PRIV_000121	Brader, Valerie				3/26/2014	State's Proposal for Structure of Release	Attorney Work Product; Mediation	Document/email containing attorney work produc
PRIV_000122	Brader, Valerie				3/26/2014	State's Proposal for Structure of Release	Attorney Work Product; Mediation	Document/email containing attorney work produc
PRIV_000123	Brader, Valerie	Heather Lennox	Steven G. Howell	Brader, Valerie (GOV)	3/28/2014	Release/Income Stabilization	Attorney Client Communication; Mediation	Document/email containing communication with attorney
PRIV_000124	Brader, Valerie				3/26/2014	State's Proposal for Structure of Release	Attorney Work Product; Mediation	Document/email containing attorney work produc
PRIV_000125	Brader, Valerie	Steven G Howeli	Heather Lennox	Brader, Valerie (GOV)	3/28/2014	Re: Release/Income Stabilization	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing attorney work produc
PRIV_000126	Brader, Valerie	Brader, Valerie (GOV); Baird, Richard (GOV); Tedder, Greg (GOV); Woosley Scott; Gadola, Michael (GOV)	Muchmore, Dennis (GOV)	Schneider, Matthew (AG) ; Steven G. Howell	3/28/2014	RE: TARP funds	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000127	Brader, Valerie	'hlennox@jonesday.com'; tawilson@jonesday.com	Dawn R. Copley	Schneider, Matthew (AG); Flancher, Steven (AG); Gadola, Michael (GOV); Brader, Valerie (GOV); Steven G. Howell; Peter H. Ellsworth; Kester K. So; Allison R. Bach	3/28/2014	State's comments on Disclosure Statement and Plan	Attomey Client Communication; Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product; Document/email containing communication with attorney
PRIV_000128	Brader, Valerie	Clinton, Kevin (TREASURY); Stibitz, Brom (Treasury); Saxton, Thomas (Treasury); Tedder, Greg (GOV); orrk@detroitmi.gov; mayss@detroitmi.gov; Bill Nowling; Gelisse, Ashley (TREASURY); Brader, Valerie (GOV); stacy Fox	Jeffrey B Ellman	Charles M.Moore ; gaurav.malhotra@ey.com; ken.buckfire@millerbuckfire.com; David G. Heiman ; Corinne Ball ; Heather Lennox ; Bruce Bennett	3/29/2014	City of Detroit Restructuring – Weekly E-Mail Update	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product; Document/email containing communication with attorney
PRIV_000129	Brader, Valerie				3/26/2014	State's Proposal for Structure of Release	Attorney Work Product; Mediation	
PRIV_000130	Brader, Valerie	Brader, Valerie (GOV)	Heather Lennox		3/31/2014	POA	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000131	Brader, Valerie	Brader, Valerie (GOV); SHowell@dickinson-wright.com	Heather Lennox		3/31/2014	Fw: Amended Plan - with non-consensual and consensual releases (v13 against v12)	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000132	Brader, Valerie					Amended Plan v 13 against v 12	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_000133	Brader, Valerie					Amended Plan v 13	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000134	Brader, Valerie					Amended Plan v 13	Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_000135	Brader, Valerie	Schneider, Matthew (AG); Gadola, Michael (GOV); Brader, Valerie (GOV); Steven G. Howell ; Peter H. Ellsworth; Flancher, Steven (AG); Saxton, Thomas (Treasury)	Kester K. So		3/31/2014	FW: UTGO - Cash flows (CONFIDENTIAL)	Common Interest Agreement; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_000136	Brader, Valerie				3/31/2014	20 year DSA Calculation	Mediation	Document/email discussing a subject incident to mediation
PRIV_000137	Brader, Valerie	Brader, Valerie (GOV)	Steven G. Howell		3/31/2014	FW: Amended Plan - with non-consensual and consensual releases (v13 against v12)	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_000138	Brader, Valerie	Steven G. Howell ; Brader, Valerie (GOV)	Heather Lennox		4/1/2014	Latest Plain English	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000139	Brader, Valerie					Jones Day Draft Notice re: Proposed HealthCare Benefits	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_000140	Brader, Valerie	Heather Lennox	Steven G. Howell	Brader, Valerie (GOV)	4/1/2014	State Draft Conditions - Confidential/Subject to Mediation Order	Common Interest Agreement; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_000141	Brader, Valerie				4/1/2014	Conditions to Contribution by SOM	Mediation	Document/email discussing a subject incident to mediation

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PRIV_000142	Brader, Valerie	Heather Lennox'	Steven G. Howell	David G. Heiman ; Evan Miller ; Brader, Valerie (GOV) ; Gadola, Michael (GOV)	4/1/2014	RE: IS Program	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000143	Brader, Valerie	Brader, Valerie (GOV)	Gadola, Michael (GOV)		4/2/2014	FW: IS Program	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000144	Brader, Valerie	Gadola, Michael (GOV); Schneider, Matthew (AG); Peter H. Ellsworth; Kester K. So; Dawn R. Copley; Allison R. Bach	Steven G. Howell	Brader, Valerie (GOV)	4/2/2014	FW: States Statement of Conditions	Mediation .	Document/email discussing a subject incident to mediation
PRIV_000145	Brader, Valerie					Conditions to Contribution by SOM	Mediation	Document/email discussing a subject incident to mediation
PRIV_000146	Brader, Valerie	Brader, Valerie (GOV); Gadola, Michael (GOV); Schneider, Matthew (AG)	Steven G. Howell		4/5/2014	Foundations	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000147	Brader, Valerie	Brader, Valerie (GOV); Gadola, Michael (GOV); SHowell@dickinson-wright.com	Heather Lennox		4/5/2014	Fw: Conditions to State Contribution	Common Interest Agreement; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_000148	Brader, Valerie	Heather Lennox	Steven G. Howell	Brader, Valerie (GOV) ; Gadola, Michael (GOV)	4/5/2014	Re: Conditions to State Contribution	Mediation	Document/email discussing a subject incident to mediation
PRIV_000149	Brader, Valerie	Brader, Valerie (GOV) ; Gadola, Michael (GOV)	Steven G. Howell		4/5/2014	Issue re Pensions	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000150	Brader, Valerie	Steven G. Howell ; Brader, Valerie (GOV) ; gaurav.malhotra@ey.com; Evan Miller ; Mary M Reil	Heather Lennox		4/7/2014	Fw: Retiree Solicitation Game Plan - Plain Language	Common Interest Agreement	Document/email containing communication with attorney
PRIV_000151	Brader, Valerie	, , , , , , , , , , , , , , , , , , , ,				Draft City of Detroit Amended POA: Summary of Pension Treatment and OPEB	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000152	Brader, Valerie	Brader, Valerie (GOV)	West, Samantha (GOV)		4/7/2014	RE: Issue re Pensions	Attorney Client Communication; Deliberative process; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation; Email containing predecisional deliberations
PRIV_000153	Brader, Valerie	Stoddard, Phil (DTMB); 'CDeRose@mersofmich.com'; Brader, Valerie (GOV)	Herbach, Michael (DTMB)	Vanden Bosch, Kerrie (DTMB) ; West, Samantha (GOV)	4/7/2014	RE: Confidential: Attorney-Client Privilege	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000154	Brader, Valerie				4/7/2014	Benefits Comparison	Attorney Work Product; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000155	Brader, Valerie	Brader, Valerie (GOV)	Schneider, Matthew (AG)	Stoddard, Phil (DTMB); CDeRose@mersofmich.com; Vanden Bosch, Kerrie (DTMB); West, Samantha (GOV); Flancher, Steven (AG); Herbach, Michael (DTMB); Gadola, Michael (GOV); Monticello, Frank (AG)	4/7/2014	Re: Confidential: Attomey-Client Privilege	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000156	Brader, Valerie	Brader, Valerie (GOV) ; Saxton, Thomas (Treasury) ; Kester K. So	Steven G. Howell	Gadola, Michael (GOV) ; West, Samantha (GOV)	4/7/2014	RE: Tomorrow	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000157	Brader, Valerie	Steven G. Howell	Gadola, Michael (GOV)	Brader, Valerie (GOV); Saxton, Thomas (Treasury); Kester K. So; West, Samantha (GOV)	4/7/2014	Re: Тотогоw	Attorney Client Communication; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation

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PRIV_000158	Brader, Valerie	Clinton, Kevin (TREASURY)	West, Samantha (GOV)	Doyle, Maureen (Treasury) ; Brader, Valerie (GOV)	4/8/2014	RE: Confidential: Attomey-Client Privilege	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000159	Brader, Valerie	Bjork, Jeffrey E.; llarose@chadbourne.com; Dubrow, David L.; David G. Heiman; Coleman, Timothy R.	Gerald Rosen	Brader, Valerie (GOV); Gadola, Michael (GOV); EDriker; Elizabeth_Perris; Victoria_Roberts	4/8/2014	Mediators' UTGO settlement statement rough draft	Mediation	Document/email discussing a subject incident to mediation
PRIV_000160	Brader, Valerie				4/9/2014	Statement of Detroit Bankruptcy Mediators	Mediation	Document/email discussing a subject incident to mediation
PRIV_000161	Brader, Valene	Gerald Rosen'; llarose@chadbourne.com; Dubrow, David L. ; David G. Heiman ; Coleman, Timothy R.	Bjork, Jeffrey E.	Brader, Valerie (GOV); Gadola, Michael (GOV); EDriker; Elizabeth_Perris; Victoria_Roberts	4/8/2014	RE: Mediators' UTGO settlement statement – rough draft	Mediation	Document/email discussing a subject incident to mediation
PRIV_000162	Brader, Valerie	Bjork, Jeffrey E.; 'llarose@chadbourne.com'; 'Dubrow, David L.'; 'David G. Heiman'; 'Coleman, Timothy R.'	Gerald Rosen	Brader, Valerie (GOV); Gadola, Michael (GOV); 'EDriker'; Elizabeth_Perris; Victoria_Roberts	4/8/2014	Re: Mediators' UTGO settlement statement – rough draft	Mediation	Document/email discussing a subject incident to mediation
PRIV_000163	Brader, Valerie	Gerald_Rosen; Bjork, Jeffrey E.; llarose@chadbourne.com; Dubrow, David L.; Coleman, Timothy R.	David G. Heiman	Brader, Valerie (GOV); Gadola, Michael (GOV); EDriker; Elizabeth_Perris; Victoria_Roberts	4/8/2014	RE: Mediators' UTGO settlement statement rough draft	Mediation	Document/email discussing a subject incident to mediation
PRIV_000164	Brader, Valerie	David G. Heiman ; Gerald_Rosen; Bjork, Jeffrey E. ; Dubrow, David L. ; Coleman, Timothy R.	Larose, Lawrence	Brader, Valerie (GOV); Gadola, Michael (GOV); EDriker; Elizabeth_Perris; Victoria_Roberts	4/8/2014	RE: Mediators' UTGO settlement statement rough draft	Mediation	Document/email discussing a subject incident to mediation
PRIV_000165	Brader, Valerie	Larose, Lawrence	Gerald_Rosen	Brader, Valerie (GOV); Coleman, Timothy R.; Dubrow, David L.; David G. Heiman; EDriker; Elizabeth_Perris; Gadola, Michael (GOV); Bjork, Jeffrey E.; Victoria_Roberts; toriellg@cooley.edu	4/8/2014	RE: Mediators' UTGO settlement statement – rough draft	Mediation	Document/email discussing a subject incident to mediation
PRIV_000166	Brader, Valerie	Brader, Valerie (GOV)	Gadola, Michael (GOV)		4/8/2014	Fwd: UTGO settlement announcement	Attorney Client Communication; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_000167	Brader, Valerie	Brader, Valerie (GOV)	Herbach, Michael (DTMB)	Stoddard, Phil (DTMB)	4/9/2014	RE: Confidential: Attorney-Client Privilege: Conference Call	Attomey Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000168	Brader, Valerie	Gadola, Michael (GOV)	Brock Swartzle	Brader, Valerie (GOV) ; Travis Weber ; Brian Mills	4/9/2014	RE: Detroit	Mediation	Document/email discussing a subject incident to mediation
PRIV_000169	Brader, Valerie	Brock Swartzle	Gadola, Michael (GOV)	Brader, Valerie (GOV) ; Travis Weber ; Brian Mills	4/9/2014	Re: Detroit	Mediation	Document/email discussing a subject incident to mediation
PRIV_000170	Brader, Valerie	Brader, Valerie (GOV)	Monticello, Frank (AG)	Schneider, Matthew (AG); Elworth, George (AG); Grossi, Christina (AG); Booth, Joshua O. (AG); Herbach, Michael (DTMB); Stoddard, Phil (DTMB)	4/9/2014	CONFIDENTIAL ATTORNEY / CLIENT Questions related to 9:30 phone conference	Attorney Client Communication; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_000171	Brader, Valerie					Questions Related to Detroit GRS Hybrid Trust	Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_000172	Brader, Valerie					Questions related to Detroit GRS Hybrid Plan	Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_000173	Brader, Valerie	lukasz@paszek.com; Brader, Valerie (GOV)	Gaurav.Malhotra@ey.com	Jonathan. Siegel@ey.com; OrrK@detroitmi.gov; hlennox@jonesday.com; dgheiman@JonesDay.com; emiller@JonesDay.com; Juan.Santambrogio@ey.com	4/9/2014	Fw: Estimated Retiree Stabilization Payments (including 20-year projections)	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000174	Brader, Valerie				4/9/2014	Detroit Retirees Stabilization Plan	Common Interest Agreement; Mediation	Document/email containing attorney work product, Document/email discussing a subject incident to mediation
PRIV_000175	Brader, Valerie	Brader, Valerie (GOV)	Lukasz Paszek		4/9/2014	FW: Estimated Retiree Stabilization Payments (including 20-year projections)	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000176	Brader, Valerie	Lukasz Paszek	West, Samantha (GOV)	Brader, Valerie (GOV)	4/10/2014	RE: Estimated Retiree Stabilization Payments (including 20-year projections)	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000177	Brader, Valerie	Brader, Valerie (GOV)	Monticello, Frank (AG)	Schneider, Matthew (AG); Elworth, George (AG); Grossi, Christina (AG); Booth, Joshua O. (AG); Herbach, Michael (DTMB)	4/10/2014	CONFIDENTIAL Attorney Client Privileged	Attorney Client Communication; Mediation	Document/email containing attorney work product; Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000178	Brader, Valene	Schneider, Matthew (AG); Flancher, Steven (AG); Gadola, Michael (GOV); Brader, Valerie (GOV)	Dawn R. Copley	Steven G. Howell ; Peter H. Ellsworth ; Kester K. So ; Allison R. Bach	4/10/2014	Suggested revisions to Disclosure Statement and Plan	Attorney Client Communication	Document/email containing communication with attorney
PRIV_000179	Brader, Valerie					Suggested revisions to Disclosure Statement and Plan	Attorney Work Product	Document/email containing attorney work product
PRIV_000180	Brader, Valerie	Schneider, Matthew (AG); Flancher, Steven (AG); Gadola, Michael (GOV); Brader, Valerie (GOV)	Allison R. Bach	Steven G. Howell ; Peter H. Ellsworth ; Kester K. So ; Dawn R. Copley	4/10/2014	Summary of Objections to the Amended Disclosure Statement	Attorney Client Communication	Document/email containing communication with attorney
PRIV_000181	Brader, Valerie					Summary of Objections to the Amended Disclosure Statement	Attorney Work Product	Document/email containing attorney work product
PRIV_000182	Brader, Valerie	Gaurav.Malhotra@ey.com	Jonathan.Siegel@ey.com	Brader, Valerie (GOV); dgheiman@JonesDay.com; emiller@JonesDay.com; hlennox@jonesday.com; Juan.Santambrogio@ey.com; lukasz@paszek.com; OmK@detroitmi.gov	4/11/2014	Re: Fw: Estimated Retiree Stabilization Payments (including 20-year projections)	Common Interest Agreement; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_000183	Brader, Valerie	Brader, Valerie (GOV)	Steven G. Howell	Dawn R. Copley ; Allison R. Bach ; Kester K. So	4/11/2014	RE: IS Program	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000184	Brader, Valerie	Brader, Valerie (GOV) ; Priest, Chris (GOV)	Lukasz Paszek		4/11/2014	RE: Fw: Estimated Retiree Stabilization Payments (including 20-year projections)	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_000185	Brader, Valerie	Lukasz Paszek	Priest, Chris (GOV)	Brader, Valerie (GOV)	4/11/2014	Re: Estimated Retiree Stabilization Payments (including 20-year projections)	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000186	Brader, Valerie	Brader, Valerie (GOV)	Priest, Chris (GOV)	Lukasz Paszek	4/11/2014	Re: Estimated Retiree Stabilization Payments (including 20-year projections)	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000187	Brader, Valerie	Brader, Valerie (GOV)	Priest, Chris (GOV)	Lukasz Paszek	4/11/2014	Re: Estimated Retiree Stabilization Payments (including 20-year projections)	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000188	Brader, Valerie	Priest, Chris (GOV)	Lukasz Paszek	Brader, Valerie (GOV)	4/11/2014	Re: Estimated Retiree Stabilization Payments (including 20-year projections)	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000189	Brader, Valerie	Priest, Chris (GOV)	Lukasz Paszek	Brader, Valerie (GOV)	4/11/2014	Re: Estimated Retiree Stabilization Payments (including 20-year projections)	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation

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PRIV_000190	Brader, Valerie	Lukasz Paszek	Priest, Chris (GOV)	Brader, Valerie (GOV)	4/11/2014	Re: Estimated Retiree Stabilization Payments (including 20-year projections)	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000191	Brader, Valerie	Amanda VanDusen ; Brader, Valerie (GOV)	Heather Lennox	Evan Miller ; Kenneth J. Sachs ; Mary M Reil ; Sarah Griffin	4/11/2014	Re: Draft Pension Trust Legislation	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject fincident to mediation
PRIV_000192	Brader, Valerie	Heather Lennox	Van Dusen, Amanda	Brader, Valerie (GOV) ; Evan Miller ; Mary M Reil ; Sachs, Kenneth J. ; Sarah Griffin	4/11/2014	RE: Draft Pension Trust Legislation	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000193	Brader, Valerie	Van Dusen, Amanda ; Heather Lennox	Sarah Griffin	Brader, Valerie (GOV) ; Evan Miller ; Mary M Reil ; Sachs, Kenneth J.	4/11/2014	RE: Draft Pension Trust Legislation	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000194	Brader, Valerie	Sarah Griffin	Mary M Reil	Brader, Valerie (GOV); Evan Miller; Heather Lennox; Sachs, Kenneth J.; Van Dusen, Amanda	4/11/2014	RE: Draft Pension Trust Legislation	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000195	Brader, Valerie	Dawn R. Copley	Flancher, Steven (AG)	Schneider, Matthew (AG); Steven G. Howell; Gadola, Michael (GOV); Brader, Valerie (GOV); Peter H. Ellsworth; Kester K. So	4/11/2014	FW: Suggested revisions to Disclosure Statement and Plan	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000196	Brader, Valerie	Brader, Valerie (GOV)	Schneider, Matthew (AG)	Gadola, Michael (GOV) ; Steven G. Howell ; Flancher, Steven (AG)	4/11/2014	Re: Draft Pension Trust Legislation	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000197	Brader, Valerie	Flancher, Steven (AG)	Dawn R. Copley	Schneider, Matthew (AG); Steven G. Howell; Gadola, Michael (GOV); Brader, Valerie (GOV); Peter H. Ellsworth; Kester K. So	4/11/2014	RE: Suggested revisions to Disclosure Statement and Plan	Attorney Client Communication	Document/email containing communication with attorney
PRIV_000198	Brader, Valerie	Steven G. Howell ; Brader, Valerie (GOV)	Heather Lennox		4/12/2014	Please do not share this	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000199	Brader, Valerie				4/11/2014	Jones Day 2nd Draft Amended Plan for Adjustment	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product Document/email discussing a subject incident to mediation
PRIV_000200	Brader, Valerie	Gadola, Michael (GOV); Brader, Valerie (GOV); Schneider, Matthew (AG); Flancher, Steven (AG)	Steven G. Howell	Kester K. So; Peter H. Ellsworth; Dawn R. Copley; Allison R. Bach	4/13/2014	State Contribution Agreement	Attomey Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000201	Brader, Valerie				4/13/2014	Draft of suggested changes to plan provisions related to the state contribution agreement	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000202	Brader, Valerie				4/13/2014	Draft of Contribution Agreement	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000203	Brader, Valerie				4/13/2014	Draft of City of Detroit settlement term sheet for retired Detroit police and firefighters associatio	Attorney Work Product; Mediation	Document/email containing attorney work produc
PRIV_000204	Brader, Valerie	Brader, Valerie (GOV) ; lukasz@paszek.com	Juan.Santambrogio@ey.com	dgheiman@JonesDay.com; emiller@JonesDay.com; hlennox@jonesday.com; Jonathan.Siegel@ey.com; OmK@detroitmi.gov; Gaurav.Malhotra@ey.com	4/14/2014	Re: Fw: Estimated Retiree Stabilization Payments (including 20-year projections)		Document/email discussing a subject incident to mediation
PRIV_000205	Brader, Valerie				4/14/2014	2014 estimates of income stabilization payments/Detroit pension recipients	Common Interest Agreement; Mediation	Document/email discussing a subject incident to mediation
PRIV_000206	Brader, Valerie	Steven G. Howell ; Gadola, Michael (GOV) ; Brader, Valerie (GOV) ; Schneider, Matthew (AG) ; Flancher, Steven (AG)	Allison R. Bach	Kester K. So ; Peter H. Ellsworth ; Dawn R. Copley	4/14/2014	RE: State Contribution Agreement	Attorney Client Communication; Attorney Work Product	Document/email containing communication with attorney
PRIV_000207	Brader, Valerie	, , , , , , , , , , , , , , , , , , , ,			4/13/2014	Draft of Contribution Agreement	Attorney Work Product; Mediation	Document/email containing attorney work product

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PRIV_000208	Brader, Valerie				4/13/2014	Draft of Contribution Agreement	Attorney Work Product; Mediation	Document/email containing attorney work product
PRIV_000209	Brader, Valerie	orrk@detroitmi.gov; nowlingb@detroitmi.gov; Tedder, Greg (GOV) ; Brader, Valerie (GOV) ; SHowell@dickinson- wright.com	Heather Lennox	Jennifer L Seidman ; Thomas A Wilson	4/15/2014	CONFIDENTIAL	Common Interest Agreement; Attorney Work Product	
PRIV_000210	Brader, Valerie				4/15/2014	Attachment/Second Amended Pan for the adjustment of debts of the city of Detroit – summary of material changes	Common Interest Agreement	Document/email containing attorney work produc
PRIV_000211	Brader, Valerie	Brader, Valerie (GOV) ; Priest, Chris (GOV)	Lukasz Paszek		4/15/2014	FW: Fw: Estimated Retiree Stabilization Payments (including 20-year projections)	Mediation	Document/email discussing a subject incident to mediation
PRIV_000212	Brader, Valerie	Brader, Valerie (GOV)	Priest, Chris (GOV)	Lukasz Paszek	4/15/2014	Re: Estimated Retiree Stabilization Payments (including 20-year projections)	Mediation	Document/email discussing a subject incident to mediation
PRIV_000213	Brader, Valerie	Brader, Valerie (GOV) ; Priest, Chris (GOV)	Lukasz Paszek		4/15/2014	RE: Fw: Estimated Retiree Stabilization Payments (including 20-year projections)	Mediation	Document/email discussing a subject incident to mediation
PRIV_000214	Brader, Valerie	Brader, Valerie (GOV); Steven G. Howell; Kester K. So; Schneider, Matthew (AG); Flancher, Steven (AG); 'PEllsworth@dickinson- wright.com'; Dawn R. Copley; Allison R. Bach (ABach@dickinson-wright.com)	Gadola, Michael (GOV)		4/15/2014	RE: State Contribution Agreement	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000215	Brader, Valerie	Lukasz Paszek	Priest, Chris (GOV)	Brader, Valerie (GOV)	4/15/2014	Re: Estimated Retiree Stabilization Payments (including 20-year projections)	Mediation	Document/email discussing a subject incident to mediation
PRIV_000216	Brader, Valerie	Steven G. Howell'; Brader, Valerie (GOV); Kester K. So; Schneider, Matthew (AG); Flancher, Steven (AG); Peter H. Ellsworth; Dawn R. Copley; Allison R. Bach	Gadola, Michael (GOV)		4/15/2014	RE: State Contribution Agreement	Attorney Client Communication; Mediation	Document/email containing communication with attorney
PRIV_000217	Brader, Valerie	Brader, Valerie (GOV)	Juan.Santambrogio@ey.com	dgheiman@JonesDay.com; emiller@JonesDay.com; Gaurav.Malhotra@ey.com; hlennox@jonesday.com; Jonathan.Siegel@ey.com; lukasz@paszek.com; OrrK@detroitmi.gov; Priest, Chris (GOV)	4/15/2014	RE: Fw: Estimated Retiree Stabilization Payments (including 20-year projections)	Common Interest Agreement; Mediation	Document/email discussing a subject incident to mediation
PRIV_000218	Brader, Valerie	Heather Lennox ; Thomas A Wilson	Steven G. Howell	Gadola, Michael (GOV); Brader, Valerie (GOV); Schneider, Matthew (AG); Flancher, Steven (AG); Peter H. Ellsworth; Kester K. So; Dawn R. Copley; Allison R. Bach	4/15/2014	State Contribution Agreement	Attorney Client Communication	
PRIV_000219	Brader, Valerie				4/13/2014	Draft of Contribution Agreement	Attorney Work Product; Mediation	Document/email containing attorney work product
PRIV_000220	Brader, Valerie				4.15.2014	Notes on State Contribution Agreement	Attorney Work Product; Mediation	Document/email containing attorney work product
PRIV_000221	Brader, Valerie	Brader, Valerie (GOV)	Lukasz Paszek		4/15/2014	RE: Estimated Retiree Stabilization Payments (including 20-year projections)	Mediation	Document/email discussing a subject incident to mediation
PRIV_000222	Brader, Valerie	Brader, Valerie (GOV)	Lukasz Paszek		4/15/2014	RE: Estimated Retiree Stabilization Payments (including 20-year projections)	Mediation	Document/email discussing a subject incident to mediation
PRIV_000223	Brader, Valerie	Heather Lennox'	Steven G. Howell	Brader, Valerie (GOV)	4/15/2014	RE: State Contribution Agreement	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000224	Brader, Valerie	Brader, Valerie (GOV)	Lukasz Paszek		4/15/2014	RE: State Contribution Agreement	Mediation	Document/email discussing a subject incident to mediation
PRIV_000225	Brader, Valerie	Brader, Valerie (GOV)	Lukasz Paszek		4/15/2014	RE: State Contribution Agreement	Mediation	Document/email discussing a subject incident to mediation

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PRIV_000226	Brader, Valerie	Brader, Valerie (GOV)	Lukasz Paszek		4/15/2014	RE: State Contribution Agreement	Mediation	Document/email discussing a subject incident to mediation
PRIV_000227	Brader, Valerie	Durfee, Sally (GOV)	Tedder, Greg (GOV)	Brader, Valerie (GOV)	4/15/2014	FW: Legislative letter	Mediation	Document/email discussing a subject incident to mediation
PRIV_000228	Brader, Valerie	Mary M Reil	Steven G. Howell	Brader, Valerie (GOV)	4/15/2014	Re: Contribution Agreement	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing communication with attorney
PRIV_000229	Brader, Valerie	Steven G. Howell	Mary M Reil	Brader, Valerie (GOV)	4/15/2014	Re: Contribution Agreement	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing communication with attorney
PRIV_000230	Brader, Valerie				4/16/2014	Notes on Major additions/changes to City of Detroit plan of adjustment	Attorney Work Product; Mediation	Document/email containing attorney work produ
PRIV_000231	Brader, Valerie	Brader, Valerie (GOV)	Steven G. Howell	Allison R. Bach	4/16/2014	FW: Call re: State Contribution Agreement - Dial-in Information	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work produ
PRIV_000232	Brader, Valerie	Steven G. Howell	Allison R. Bach	Brader, Valerie (GOV)	4/16/2014	Re: Call re: State Contribution Agreement - Dial-in Information	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work produc
PRIV_000233	Brader, Valerie	Brader, Valerie (GOV) ; Heather Lennox	Steven G. Howell	Mary M Reil ; David G. Heiman ; Gaurav Malhotra ; Jennifer L Seidman ; Juan Santambrogio	4/16/2014	RE: Call re: State Contribution Agreement - Dial-in Information	Attomey Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work production
PRIV_000234	Brader, Valerie	Steven G. Howell ; Brader, Valerie (GOV)	Gordon, Robert D.	David G. Heiman ; Evan Miller ; Heather Lennox ; Michael J. VanOverbeke ; Turner, Joseph E., Jr. ; King, Ronald A.	4/16/2014	Detroit: RSCD governance	Mediation	Document/email discussing a subject incident to mediation
PRIV_000235	Brader, Valerie				4/16/2014	Material prepared for mediation	Mediation	Document/email discussing a subject incident to mediation
PRIV_000236	Brader, Valerie				4/16/2014	Material prepared for mediation	Mediation	
PRIV_000237	Brader, Valerie				4/16/2014	Communication from Kevyn Orr to Mike Duggan regarding revised language pertaining to privatization of City services	Mediation	Document/email discussing a subject incident to mediation
PRIV_000238	Brader, Valerie	Gadola, Michael (GOV); Brader, Valerie (GOV)	Brock Swartzle	Brian Mills ; Scott Starr, Travis Weber	4/16/2014	Detroit	Mediation	Document/email discussing a subject incident to mediation
PRIV_000239	Brader, Valerie	Wurfel, Sara (GOV)	Jennifer L Seidman	Brader, Valerie (GOV); Tedder, Greg (GOV); Heather Lennox; Thomas A Wilson	4/16/2014	Fw: Detroit - Filed Versions	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000240	Brader, Valerie	Brock Swartzle' ; Brader, Valerie (GOV)	Gadola, Michael (GOV)	Brian Mills ; Scott Starr, Travis Weber ; West, Samantha (GOV) ; Tedder, Greg (GOV) ; Kester K. So; Steven G. Howell	4/16/2014	RE: Detroit	Mediation	Document/email discussing a subject incident to mediation
PRIV_000241	Brader, Valerie	Mike Duggan	Kevyn Orr	Stacy Fox; dgheiman@jonesday.com; emiller@jonesday.com; hlennox@jonesday.com; Brader, Valerie (GOV)	4/16/2014	Fwd: Detroit - AFSCME Tentative Agreement (revised Privatization Language)	Mediation	Document/email discussing a subject incident to mediation
PRIV_000242	Brader, Valerie				4/16/2014	Communication from Kevyn Orr to Mike Duggan regarding revised language pertaining to privatization of City services	Mediation	
PRIV_000243	Brader, Valerie	Brader, Valerie (GOV)	Steven G. Howell	Gadola, Michael (GOV); Deborah L. Grace; Kester K. So; Peter H. Ellsworth; Dawn R. Copley; Allison R. Bach	4/16/2014	Revised Draft of the Investment Committee Governance Term Sheet	Attorney Client Communication; Mediation	Document/email discussing a subject incident to mediation
PRIV_000244	Brader, Valerie	Brader, Valerie (GOV); Schneider, Matthew (AG); Gadola, Michael (GOV); Flancher, Steven (AG)	Allison R. Bach	Gustafson, Holly (AG); Steven G. Howell; Dawn R. Copley; Kester K. So; Peter H. Ellsworth	4/16/2014	Second Amended Plan and Disclosure Statement	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000245	Brader, Valerie	Gadola, Michael (GOV)	Brock Swartzle	Brader, Valerie (GOV); Brian Mills; Scott Starr; Travis Weber; West, Samantha (GOV); Tedder, Greg (GOV); Kester K. So; Steven G. Howell	4/16/2014	Re: Detroit	Mediation	Document/email discussing a subject incident to mediation

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rivileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000246	Brader, Valerie	Kester K. So; Steven G. Howell; Brader, Valerie (GOV); Tedder, Greg (GOV)	Gadola, Michael (GOV)	Ackerman, Darin (GOV) ; Durfee, Sally (GOV)	4/17/2014	FW: Settlement Appropriations	Attorney Client Communication; Mediation	Document/email containing communication with attorney
PRIV_000247	Brader, Valerie	Kester K. So; Steven G. Howell	Gadola, Michael (GOV)	Brader, Valerie (GOV); Tedder, Greg (GOV); Durfee, Sally (GOV); Ackerman, Darin (GOV)	4/17/2014	FW: Detroit	Mediation	
PRIV_000248	Brader, Valerie	Brader, Valerie (GOV)	West, Samantha (GOV)	Gadola, Michael (GOV)	4/17/2014	FW: FINAL Revised Draft of the Investment Committee Governance Term Sheet	Attorney Client Communication; Mediation	
PRIV_000249	Brader, Valerie				4/16/2014	Draft of City of Detroit settlement term sheet for retired Detroit police and firefighters association	Attorney Work Product; Mediation	Document/email discussing a subject incident to mediation
PRIV_000250	Brader, Valerie			·	4/17/2014	Draft of City of Detroit settlement term sheet for retired Detroit police and firefighters association	Attorney Work Product; Mediation	Document/email discussing a subject incident to mediation
PRIV_000251	Brader, Valerie	Baird, Richard (GOV); Tedder, Greg (GOV)	Gadola, Michael (GOV)	Brader, Valerie (GOV)	4/18/2014	FW: Notice of mediation session – Subject to Mediation Confidentiality and Privilege	Mediation	Document/email discussing a subject incident to mediation
PRIV_000252	Brader, Valerie	Gadola, Michael (GOV); Brader, Valerie (GOV)	Steven G. Howell		4/18/2014	Fwd: Notice of mediation session – Subject to Mediation Confidentiality and Privilege	Attorney Client Communication; Mediation	Document/email containing communication with attorney
PRIV_000253	Brader, Valerie	Brader, Valerie (GOV)	Gadola, Michael (GOV)		4/18/2014	FW: *Confidential: Fw: Privileged and Confidential Attorney-Client Communication (Outsourcing)	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product
PRIV_000254	Brader, Valerie				4/18/2014	City of Detroit GRS Coalition template agreement	Attomey Client Communication; Common Interest Agreement; Attomey Work Product; Mediation	Document/email containing attorney work product
PRIV_000255	Brader, Valerie	Clinton, Kevin (TREASURY); Stibitz, Brom (Treasury); Saxton, Thomas (Treasury); Tedder, Greg (GOV); orrk@detroitmi.gov; mayss@detroitmi.gov; Bill Nowling; Gelisse, Ashley (TREASURY); Brader, Valerie (GOV); stacy Fox	Jeffrey B Ellman	Charles M.Moore ; gaurav.malhotra@ey.com; ken.buckfire@millerbuckfire.com; David G. Heiman ; Corinne Ball ; Heather Lennox ; Bruce Bennett	4/20/2014	City of Detroit Restructuring – Weekly E-Mail Update	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product
PRIV_000256	Brader, Valerie	Priest, Chris (GOV); Brader, Valerie (GOV)	Tedder, Greg (GOV)		2/12/2014	FW: [NEWS RELEASE] IMPORTANT NOTICE TO ALL CITY RETIREES: Feb. 15 is Deadline to Sign Up Health Coverage for Non-Medicare Eligible Retiree	Attorney Client Communication	Document/email containing communication with attorney
PRIV_000257	Brader, Valerie	Brader, Valerie (GOV) ; Priest, Chris (GOV)	Tedder, Greg (GOV)		2/12/2014	RE: [NEWS RELEASE] IMPORTANT NOTICE TO ALL CITY RETIREES: Feb. 15 is Deadline to Sign Up Health Coverage for Non-Medicare Eligible Retiree	Attorney Client Communication	Document/email containing communication with attorney
PRIV_000258	Brader, Valerie	Tedder, Greg (GOV); Brader, Valerie (GOV)	Ackerman, Darin (GOV)		2/7/2014	FW: Detroit	Mediation	Document/email discussing a subject incident to mediation
PRIV_000259	Brader, Valerie	Steven G. Howell ; Gadola, Michael (GOV) ; Brader, Valerie (GOV)	Gordon, Robert D.	Bradley A. Robins ; Eric Mendelsohn ; Michael J. VanOverbeke ; Turner, Joseph E., Jr. ; King, Ronald A.	2/11/2014	Detroit: Retirement Systems' POA issue analysis	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_000260	Brader, Valerie				1/21/2014	Plan of adjustment consideration on behalf of the retirement systems of the city of Detroit	Attorney Client Communication; Attorney Work Product; Deliberative process; Mediation	Document/email containing communication with attorney
PRIV_000261	Brader, Valerie	Gadola, Michael (GOV); Brader, Valerie (GOV); Schneider, Matthew (AG); Flancher, Steven (AG)	Steven G. Howell		2/13/2014	FW: Materials For Governor's Team - confidential settlement information Rule 408	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing communication with attorney
PRIV_000262	Brader, Valerie				2/13/2014	Lazard Presentation Materials	Mediation	Document/email discussing a subject incident to mediation

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PRIV_000263	Brader, Valerie	Gadola, Michael (GOV); Gordon, Robert D.	Eric Mendelsohn	Steven G. Howell ; Brader, Valerie (GOV) ; Brad Robins ; Michael J. VanOverbeke ; Turner, Joseph E., Jr. ; King, Ronald A.	2/13/2014	RE: Detroit: Retirement Systems' POA issue analysis	Mediation	Document/email discussing a subject incident to mediation
PRIV_000264	Brader, Valerie	Gadola, Michael (GOV) ; Brader, Valerie (GOV) ; Steven G. Howell	Schneider, Matthew (AG)		9/12/2013	First Mediation Session Talking Points 9-12-13.docx	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing communication with attorney
PRIV_000265	Brader, Valerie				9/17/2014	First mediation session state of Michigan public positions	Attorney Client Communication; Mediation	Document/email containing attorney work product
PRIV_000266	Brader, Valerie	Brader, Valerie (GOV) ; Gadola, Michael (GOV) ; Steven G. Howell	Schneider, Matthew (AG)	·	9/13/2013	Mediation Notes	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing communication with attorney
PRIV_000267	Brader, Valerie					First Mediation Work Sheet	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing communication with attorney
PRIV_000268	Brader, Valerie	Schneider, Matthew (AG); Gadola, Michael (GOV); Brader, Valerie (GOV)	Steven G. Howell		9/18/2013	Mediation Notes - SUBJECT TO (1) ATTORNEY CLIENT & WORK PRODUCT PRIVILEGES AND FRE 408 - CONFIDENTIAL	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing communication with attorney
PRIV_000269	Brader, Valerie				4/14/2014	Apr 14 Detroit meeting	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	Document/email containing communication with attorney
PRIV_000270	Brader, Valerie	Evan Miller	Lukasz Paszek	Brader, Valerie (GOV) ; Priest, Chris (GOV)	2/8/2014	Detroit retiree request template // Confidential - Subject to mediation order	Mediation	Document/email discussing a subject incident to mediation
PRIV_000271	Brader, Valerie				2/7/2014	Retiree Request v 1	Mediation	Document/email discussing a subject incident to mediation
PRIV_000272	Brader, Valerie	Snyder, Rick (GOV); Scott, Allison (GOV)	Brader, Valerie (GOV)	Muchmore, Dennis (GOV); Roberts, John (GOV); Tedder, Greg (GOV); Gadola, Michael (GOV); Holyfield, Jeff (GOV); Murley, David (GOV)	7/22/2013	LEGAL ADVICE DO NOT FORWARD	Attorney Client Communication	Document/email containing communication with attorney
PRIV_000273	Brader, Valerie	Wildman, Michele (MSHDA)	Brader, Valerie (GOV)		3/21/2014	Re: CONFIDENTIAL AND SUBJECT TO MEDIATION ORDER	Mediation	Document/email discussing a subject incident to mediation
PRIV_000274	Brader, Valerie	Wurfel, Sara (GOV)	Brader, Valerie (GOV)	Agen, Jarrod (GOV)	3/21/2014	Re: Heads up on DWSD	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000275	Brader, Valerie	West, Samantha (GOV)	Brader, Valerie (GOV)		3/21/2014	Fwd: CONFIDENTIAL AND SUBJECT TO MEDIATION ORDER	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000276	Brader, Valerie	Bill Nowling	Brader, Valerie (GOV)		3/21/2014	Fwd: RFI for DWSD	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000277	Brader, Valerie	Steven G. Howell	Brader, Valerie (GOV)		3/21/2014	Fwd: Plain Language Insert	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000278	Brader, Valerie	Heather Lennox ; Evan Miller	Brader, Valerie (GOV)		3/21/2014	Fwd: LowIncomeModel: Confidential - Subject to mediation order	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000279	Brader, Valerie	Bill Nowling; Agen, Jarrod (GOV); Wurfel, Sara (GOV); Muchmore, Dennis (GOV); Rustem, William (GOV)	Brader, Valerie (GOV)		3/21/2014	Fwd: DWSD: FINAL RFI	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000280	Brader, Valerie	Eugene Driker ; Gerald Rosen	Brader, Valerie (GOV)	Gadola, Michael (GOV)	3/21/2014	Fwd: LowIncomeModel: Confidential - Subject to mediation order	Mediation	Document/email discussing a subject incident to mediation
PRIV_000281	Brader, Valerie	Snyder, Rick (GOV) ; Scott, Allison (GOV) ; Gadola, Michael (GOV)	Brader, Valerie (GOV)	Tedder, Greg (GOV); Muchmore, Dennis (GOV); Posthumus, Dick (GOV)	3/23/2014	RE: Conf call today	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation

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PRIV_000282	Brader, Valerie	Dawn R. Copley	Brader, Valerie (GOV)	Schneider, Matthew (AG) ; Gadola, Michael (GOV) ; 'Steven G. Howell'	3/23/2014	RE: Comments to Disclosure Statement	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000283	Brader, Valerie	Gadola, Michael (GOV); Schneider, Matthew (AG); Flancher, Steven (AG)	Brader, Valerie (GOV)		3/23/2014	FW: CONFIDENTIAL: Draft Solicitation Documents	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000284	Brader, Valerie					Pension/OPEB Tabulation Rules	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000285	Brader, Valerie	Gadola, Michael (GOV)	Brader, Valerie (GOV)	Snyder, Rick (GOV); Scott, Allison (GOV); Tedder, Greg (GOV); Muchmore, Dennis (GOV); Posthumus, Dick (GOV)	3/24/2014	RE: Conf call today	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000286	Brader, Valerie					Draft Letter from H. Lennox from Brader re Worker's Comp	Common Interest Agreement; Deliberative process; Executive; Mediation	Document/email containing communication with attorney
PRIV_000287	Brader, Valerie	Scott, Allison (GOV); Snyder, Rick (GOV)	Brader, Valerie (GOV)	Gadola, Michael (GOV); Tedder, Greg (GOV); Muchmore, Dennis (GOV); Posthumus, Dick (GOV)	3/25/2014	additional scenario information	Mediation	Document/email discussing a subject incident to mediation
PRIV_000288	Brader, Valerie	Gadola, Michael (GOV); Muchmore, Dennis (GOV)	Brader, Valerie (GOV)		3/25/2014	Fwd: Negotiations with Don Taylor	Mediation	Document/email discussing a subject incident to mediation
PRIV_000289	Brader, Valerie	EDriker	Brader, Valerie (GOV)	GadolaM@jud.state.mi.us; Gerald E. Rosen ; Victoria_Roberts	3/25/2014	RE: Negotiations with Don Taylor	Mediation	Document/email discussing a subject incident to mediation
PRIV_000290	Brader, Valerie	Gadola, Michael (GOV)	Brader, Valerie (GOV)		3/25/2014	FW: Negotiations with Don Taylor	Mediation	Document/email discussing a subject incident to mediation
PRIV_000291	Brader, Valerie	Gadola, Michael (GOV); Saxton, Thomas (Treasury); Tedder, Greg (GOV)	Brader, Valerie (GOV)		3/25/2014	CONFIDENTIAL AND SUBJECT TO MEDIATION ORDER	Mediation	Document/email discussing a subject incident to mediation
PRIV_000292	Brader, Valerie				2/252014	POA 2014 Year Projections	Mediation	Document/email discussing a subject incident to mediation
PRIV_000293	Brader, Valerie	Tedder, Greg (GOV)	Brader, Valerie (GOV)		3/25/2014	RE: CONFIDENTIAL AND SUBJECT TO MEDIATION ORDER	Mediation	Document/email discussing a subject incident to mediation
PRIV_000294	Brader, Valerie	EDriker'	Brader, Valerie (GOV)	Gadola, Michael (GOV)	3/25/2014	RE: Negotiations with Don Taylor	Mediation	Document/email discussing a subject incident to mediation
PRIV_000295	Brader, Valerie	Brader, Valerie (GOV)	Brader, Valerie (GOV)	West, Samantha (GOV)	3/25/2014	FW: CONFIDENTIAL - Detroit - Draft Financial/Restructuring Analyses	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000296	Brader, Valerie	Brader, Valerie (GOV)	Brader, Valerie (GOV)		3/25/2014	Re: CONFIDENTIAL - Detroit - Draft Financial/Restructuring Analyses	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000297	Brader, Valerie	Muchmore, Dennis (GOV)	Brader, Valerie (GOV)	Gadola, Michael (GOV)	3/25/2014	Re: Negotiations with Don Taylor	Mediation	Document/email discussing a subject incident to mediation
PRIV_000298	Brader, Valerie	Gadola, Michael (GOV)	Brader, Valerie (GOV)		3/25/2014	Fwd: Negotiations with Don Taylor	Mediation	Document/email discussing a subject incident to mediation
PRIV_000299	Brader, Valerie	Lukasz Paszek	Brader, Valerie (GOV)		3/26/2014	Fwd: Draft 40 Year projections	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000300	Brader, Valerie	Saxton, Thomas (Treasury)	Brader, Valerie (GOV)		3/26/2014	CONFIDENTIAL AND SUBJECT TO MEDIATION ORDER – UTGO settlement	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000301	Brader, Valerie	Gadola, Michael (GOV)	Brader, Valerie (GOV)	Steven G. Howell	3/27/2014	Re: Retiree Committee	Mediation	
PRIV_000302	Brader, Valerie	Gadola, Michael (GOV)	Brader, Valerie (GOV)	Steven G. Howell	3/27/2014	RE: Retiree Committee	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation

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PRIV_000303	Brader, Valerie	Schneider, Matthew (AG); SHowell@dickinson-wright.com	Brader, Valerie (GOV)	Gadola, Michael (GOV)	3/28/2014	FW: Purchase Agreement Documents	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000304	Brader, Valerie	Steven G. Howell'	Brader, Valene (GOV)		3/28/2014	RE: TARP funds	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000305	Brader, Valerie	Saxton, Thomas (Treasury) ; Clinton, Kevin (TREASURY)	Brader, Valerie (GOV)		3/28/2014	FW: #22035825v3 <active> - Detroit - City Revised Draft UTGO Term Sheet 3/25- #22035825v4<active> - Detroit - City Revised Draft UTGO Term Sheet 3/25</active></active>	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_000306	Brader, Valerie	Gadola, Michael (GOV)	Brader, Valerie (GOV)		3/31/2014	Fwd: Amended Plan - with non-consensual and consensual releases (v13 against v12)	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_000307	Brader, Valerie	Heather Lennox	Brader, Valerie (GOV)		4/1/2014	Re: State Draft Conditions - Confidential/Subject to Mediation Order	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000308	Brader, Valerie	Schneider, Matthew (AG); Flancher, Steven (AG)	Brader, Valerie (GOV)	Stoddard, Phil (DTMB); CDeRose@mersofmich.com; Vanden Bosch, Kerrie (DTMB); West, Samantha (GOV); Herbach, Michael (DTMB); Gadola, Michael (GOV)	4/7/2014	Re: Confidential: Attorney-Client Privilege	Attorney Client Communication	Document/email containing communication with attorney
PRIV_000309	Brader, Valerie	West, Samantha (GOV)	Brader, Valerie (GOV)		4/7/2014	Fwd: Confidential: Attorney-Client Privilege	Attorney Client Communication	Document/email containing communication with attorney
PRIV_000310	Brader, Valerie	Steven G. Howell	Brader, Valerie (GOV)	Gadola, Michael (GOV) ; West, Samantha (GOV)	4/7/2014	Re: Issue re Pensions	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000311	Brader, Valerie	Rustem, William (GOV); Tedder, Greg (GOV); Saxton, Thomas (Treasury)	Brader, Valerie (GOV)		4/7/2014	Fwd: Questions regarding regional authority and RFI	Mediation	Document/email discussing a subject incident to mediation
PRIV_000312	Brader, Valerie	Herbach, Michael (DTMB); Stoddard, Phil (DTMB); 'CDeRose@mersofmich.com'; Monticello, Frank (AG); Schneider, Matthew (AG); Flancher, Steven (AG)	Brader, Valerie (GOV)	Vanden Bosch, Kerrie (DTMB) ; West, Samantha (GOV)	4/8/2014	RE: Confidential: Attorney-Client Privilege	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000313	Brader, Valerie	Clinton, Kevin (TREASURY)	Brader, Valerie (GOV)	West, Samantha (GOV)	4/8/2014	FW: Confidential: Attorney-Client Privilege	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000314	Brader, Valerie	Steven G. Howell	Brader, Valerie (GOV)		4/9/2014	Fwd: States Statement of Conditions	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_000315	Brader, Valerie	West, Samantha (GOV)	Brader, Valerie (GOV)		4/9/2014	Fwd: Estimated Retiree Stabilization Payments (including 20-year projections)	Attorney Client Communication; Mediation	Document/email discussing a subject incident to mediation
PRIV_000316	Brader, Valerie	Lukasz Paszek	Brader, Valerie (GOV)		4/9/2014	Re: Estimated Retiree Stabilization Payments (including 20-year projections)	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000317	Brader, Valerie	Monticello, Frank (AG)	Brader, Valerie (GOV)	Schneider, Matthew (AG); Elworth, George (AG); Grossi, Christina (AG); Booth, Joshua O. (AG); Herbach, Michael (DTMB)	4/11/2014	Re: CONFIDENTIAL Attorney Client Privileged	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000318	Brader, Valerie	Allison R. Bach	Brader, Valerie (GOV)		4/11/2014	Re: Summary of Objections to the Amended Disclosure Statement	Attorney Client Communication; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation

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PRIV_000319	Brader, Valerie	Priest, Chris (GOV) ; Lukasz Paszek	Brader, Valerie (GOV)		4/11/2014	RE: Estimated Retiree Stabilization Payments (including 20-year projections)	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000320	Brader, Valerie	Schneider, Matthew (AG)	Brader, Valerie (GOV)	Gadola, Michael (GOV)	4/11/2014	Re: Draft Pension Trust Legislation	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000321	Brader, Valerie	Tedder, Greg (GOV); Gadola, Michael (GOV); Muchmore, Dennis (GOV)	Brader, Valerie (GOV)		4/13/2014	Fwd: DRAFT POA Language re oversight	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000322	Brader, Valerie	Stacy Fox ; hlennox@JonesDay.com; Tedder, Greg (GOV)	Brader, Valerie (GOV)	tawilson@JonesDay.com; Gadola, Michael (GOV)	4/13/2014	RE: DRAFT POA Language re oversight	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000323	Brader, Valerie	'Juan.Santambrogio@ey.com'; dgheiman@JonesDay.com; emiller@JonesDay.com; Gaurav.Malhotra@ey.com; hlennox@jonesday.com; Jonathan.Siegel@ey.com; lukasz@paszek.com; OrrK@detroitmi.gov	Brader, Valerie (GOV)		4/15/2014	RE: Fw: Estimated Retiree Stabilization Payments (including 20-year projections)	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000324	Brader, Valerie	Gadola, Michael (GOV)	Brader, Valerie (GOV)		4/15/2014	FW: CONFIDENTIAL	Common Interest Agreement	Document/email containing communication with attorney
PRIV_000325	Brader, Valerie	Łukasz Paszek' ; Priest, Chris (GOV)	Brader, Valerie (GOV)		4/15/2014	RE: Fw: Estimated Retiree Stabilization Payments (including 20-year projections)	Mediation	Document/email discussing a subject incident to mediation
PRIV_000326	Brader, Valerie	Gadola, Michael (GOV)	Brader, Valerie (GOV)		4/15/2014	FW: State Contribution Agreement	Mediation	Document/email discussing a subject incident to mediation
PRIV_000327	Brader, Valerie	'Juan.Santambrogio@ey.com'; lukasz@paszek.com	Brader, Valerie (GOV)	dgheiman@JonesDay.com; emiller@JonesDay.com; hiennox@jonesday.com; Jonathan.Siegel@ey.com; OπK@detroitmi.gov; Gaurav.Malhotra@ey.com; Priest, Chris (GOV)	4/15/2014	RE: Fw: Estimated Retiree Stabilization Payments (including 20-year projections)	Mediation	Document/email discussing a subject incident to mediation
PRIV_000328	Brader, Valerie	Lukasz Paszek	Brader, Valerie (GOV)		4/15/2014	Fwd: Estimated Retiree Stabilization Payments (including 20-year projections)	Mediation	Document/email discussing a subject incident to mediation
PRIV_000329	Brader, Valerie	Lukasz Paszek	Brader, Valerie (GOV)		4/15/2014	FW: State Contribution Agreement	Mediation	Document/email discussing a subject incident to mediation
PRIV_000330	Brader, Valerie						Mediation	Document/email discussing a subject incident to mediation
PRIV_000331	Brader, Valerie	Lukasz Paszek	Brader, Valerie (GOV)		4/15/2014	Re: State Contribution Agreement	Mediation	Document/email discussing a subject incident to mediation
PRIV_000332	Brader, Valerie	Lukasz Paszek	Brader, Valerie (GOV)		4/15/2014	Re: State Contribution Agreement	Mediation	Document/email discussing a subject incident to mediation
PRIV_000333	Brader, Valerie	Lukasz Paszek	Brader, Valerie (GOV)		4/15/2014	Re: State Contribution Agreement	Mediation	Document/email discussing a subject incident to mediation
PRIV_000334	Brader, Valerie	Juan.Santambrogio@ey.com	Brader, Valerie (GOV)	Heiman David G.; emiller@JonesDay.com; Gaurav.Malhotra@ey.com; hlennox@jonesday.com; Jonathan.Siegel@ey.com; lukasz@paszek.com; Orrk@detroitmi.gov; Priest, Chris (GOV); Mary M Reil; Steven G. Howell	4/15/2014	Re: Estimated Retiree Stabilization Payments (including 20-year projections)	Mediation	Document/email discussing a subject incident to mediation
PRIV_000335	Brader, Valerie	Mary M Reil	Brader, Valerie (GOV)	Steven G. Howell	4/15/2014	Re: Contribution Agreement	Mediation	Document/email discussing a subject incident to mediation
PRIV_000336	Brader, Valerie	Muchmore, Dennis (GOV)	Brader, Valerie (GOV)		4/15/2014	Fwd: AFSCME outsourcing terms CONFIDENTIAL, ATTY CLIENT, SUBJECT TO MEDIATION ORDER	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation

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PRIV_000337	Brader, Valerie	Steven G. Howell	Brader, Valerie (GOV)		4/15/2014	Re: Call re: State Contribution Agreement	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000338	Brader, Valerie	Wurfel, Sara (GOV)	Brader, Valerie (GOV)	Snyder, Rick (GOV); Calley, Brian (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Posthumus, Dick (GOV); Tedder, Greg (GOV); Gadola, Michael (GOV); Baird, Richard (GOV); Agen, Jarrod (GOV); Scott, Allison (GOV); Wisniewski, Wendy (GOV)	4/15/2014	Revised plan of action on POA – Atty client, confidential	Attomey Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000339	Brader, Valerie	Tedder, Greg (GOV)	Brader, Valerie (GOV)		4/16/2014	Re: Detroit	Mediation	Document/email discussing a subject incident to mediation
PRIV_000340	Brader, Valerie	Gadola, Michael (GOV) ; Muchmore, Dennis (GOV)	Brader, Valerie (GOV)		4/16/2014	Fwd: Update	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000341	Brader, Valerie				4/16/2014	Attachment/Second Amended Pan for the adjustment of debts of the city of Detroit – summary of material changes	Mediation	Document/email discussing a subject incident to mediation
PRIV_000342	Brader, Valerie				4/16/2014	Attachment/Second Amended Pan for the adjustment of debts of the city of Detroit – summary of material changes	Mediation	Document/email discussing a subject incident to mediation
PRIV_000343	Brader, Valerie	Lukasz Paszek	Brader, Valerie (GOV)		4/17/2014	FW: Second Amended Plan and Disclosure Statement	Mediation	Document/email discussing a subject incident to mediation
PRIV_000344	Brader, Valerie	'Robert D. Gordon (rgordon@clarkhill.com)'	Brader, Valerie (GOV)	Gadola, Michael (GOV) ; 'Steven G. Howell' ; Heather Lennox	4/17/2014	GovernanceTermSheetGRS – CONFIDENTIAL AND SUBJECT TO MEDIATION ORDER	Mediation	Document/email discussing a subject incident to mediation
PRIV_000345	Brader, Valerie	Gadola, Michael (GOV)	Brader, Valerie (GOV)		4/18/2014	Re: Notice of mediation session – Subject to Mediation Confidentiality and Privilege	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000346	Brader, Valerie	Gadola, Michael (GOV)	Brader, Valerie (GOV)	Muchmore, Dennis (GOV); Posthumus, Dick (GOV); Baird, Richard (GOV); Tedder, Greg (GOV)	4/21/2014	Re: City of Detroit - Confidential Mediation Communication	Mediation	Document/email discussing a subject incident to mediation
PRIV_000347	Brader, Valerie	Baird, Richard (GOV)	Brader, Valerie (GOV)	Gadola, Michael (GOV); Muchmore, Dennis (GOV); Posthumus, Dick (GOV); Tedder, Greg (GOV)	4/21/2014	Re: City of Detroit - Confidential Mediation Communication	Mediation	Document/email discussing a subject incident to mediation
PRIV_000348	Brader, Valerie	Tedder, Greg (GOV)	Brader, Valerie (GOV)		8/1/2013	Fwd: Discussion this afternoon; Attorney Client Confidential	Attorney Client Communication	Document/email containing communication with attorney
PRIV_000349	Brader, Valerie	Tedder, Greg (GOV)	Brader, Valerie (GOV)		8/1/2013	Re: Discussion this afternoon; Attorney Client Confidential	Attorney Client Communication	Document/email containing communication with attorney
PRIV_000350	Brader, Valerie				8/2/2013	Memo from Valerie Brader to Gov. Snyder regarding possible pension policy changes to Champion.	Attorney Work Product; Deliberative process	Document/email containing communication with attorney; Email containing pre-decisional deliberations
PRIV_000351	Brader, Valerie	Gadola, Michael (GOV); Wurfel, Sara (GOV); Hollins, Harvey (GOV); Muchmore, Dennis (GOV); Roberts, John (GOV); Baird, Richard (GOV); Tedder, Greg (GOV); Rustem, William (GOV); Posthumus, Dick (GOV); Forstner, Nathaniel (GOV); Reid, Teresa (GOV): Holyfield, Jeff (GOV)	Brader, Valene (GOV)		8/13/2013	ATTY CLIENT CONFIDENTIAL RE: Municipal Impact of Detroit's Filing	Attorney Client Communication	Document/email containing communication with attorney
PRIV_000352	Brader, Valerie	Gadola, Michael (GOV)	Brader, Valerie (GOV)		8/13/2013	RE: ATTY CLIENT CONFIDENTIAL RE: Municipal Impact of Detroit's Filing	Attorney Client Communication	Document/email containing communication with attorney
PRIV_000353	Brader, Valerie	Manning, Peter (AG); Reichel, Robert (AG); Monticello, Frank (AG)	Brader, Valerie (GOV)	Gadola, Michael (GOV); Schneider, Matthew (AG); Rustem, William (GOV)	8/13/2013	RE: DWSD / Detroit bankruptcy/ discussions with EPA	Attomey Client Communication; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation

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PRIV_000354	Brader, Valerie	Manning, Peter (AG) ; Flancher, Steven (AG)	Brader, Valerie (GOV)	Gadola, Michael (GOV); Schneider, Matthew (AG); Stevenson, Pamela (AG)	8/19/2013	RE: draft RRO2 letter	Attorney Client Communication	Document/email containing communication with attorney
PRIV_000355	Brader, Valerie	Gadola, Michael (GOV) ; Tedder, Greg (GOV)	Brader, Valerie (GOV)		8/23/2013	FW: DIP financing decision	Attorney Client Communication; Deliberative process	Document/email containing communication with attorney; Email containing pre-decisional deliberations
PRIV_000356	Brader, Valerie	Donnelly, Mark (AG)	Brader, Valerie (GOV)	Gadola, Michael (GOV); Nelson, Margaret (AG)	8/28/2013	RE: In Re: City of Detroit, Debtor. PRIVILEGED AND CONFIDENTIAL - ATTORNEY CLIENT COMMUNICATION	Attorney Client Communication	Document/email containing communication with attorney
PRIV_000357	Brader, Valerie	Tedder, Greg (GOV)	Brader, Valerie (GOV)	Durfee, Sally (GOV); Ackerman, Darin (GOV); Gadola, Michael (GOV)	9/9/2013	ATTY CLIENT communication – do not forward	Attomey Client Communication	Document/email containing communication with attorney
PRIV_000358	Clinton, R. Kevin	Snyder, Rick (GOV)	Brader, Valerie (GOV)	Posthumus, Dick (GOV); Gadola, Michael (GOV); Rustem, William (GOV); Tedder, Greg (GOV); Lukasz Paszek; Priest, Chris (GOV); Clinton, Kevin (TREASURY); Saxton, Thomas (Treasury)	2/5/2014	FW: Subject to Mediation Order – CONFIDENTIAL	Mediation	Document/email discussing a subject incident to mediation
PRIV_000359	Clinton, R. Kevin	Clinton, Kevin (TREASURY); Stibitz, Brom (Treasury); Saxton, Thomas (Treasury); Tedder, Greg (GOV); ortk@detroitmi.gov; mayss@detroitmi.gov; Bill Nowling; Gelisse, Ashley (TREASURY); Brader, Valerie (GOV); stacy Fox	Jeffrey B Ellman	Charles M.Moore; gaurav.malhotra@ey.com; ken.buckfire@millerbuckfire.com; David G. Heiman; Corinne Ball; Heather Lennox; Bruce Bennett	2/15/2014	City of Detroit Restructuring – Weekly E-Mail Update	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product Document/email containing communication with attorney
PRIV_000360	Clinton, R. Kevin	Clinton, Kevin (TREASURY); Stibitz, Brom (Treasury); Saxton, Thomas (Treasury); Tedder, Greg (GOV); orrk@detroitmi.gov; mayss@detroitmi.gov; Bill Nowling; Gelisse, Ashley (TREASURY); Brader, Valerie (GOV); stacy Fox	Jeffrey B Ellman	Charles M.Moore ; gaurav.malhotra@ey.com; ken.buckfire@millerbuckfire.com; David G. Heiman ; Corinne Ball ; Heather Lennox ; Bruce Bennett	2/21/2014	City of Detroit Restructuring – Weekly E-Mail Update	Attomey Client Communication; Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product Document/email containing communication with attorney
PRIV_000361	Clinton, R. Kevin	Clinton, Kevin (TREASURY); Stibitz, Brom (Treasury); Saxton, Thomas (Treasury); Tedder, Greg (GOV); ortk@detroitmi.gov; mayss@detroitmi.gov; Bill Nowling; Gelisse, Ashley (TREASURY); Brader, Valerie (GOV); stacy Fox	Jeffrey B Ellman	Charles M.Moore ; gaurav.malhotra@ey.com; ken.buckfire@millerbuckfire.com; David G. Heiman ; Corinne Ball ; Heather Lennox ; Bruce Bennett	2/28/2014	City of Detroit Restructuring – Weekly E-Mail Update	Attomey Client Communication; Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product Document/email containing communication with attorney
PRIV_000362	Clinton, R. Kevin	Schneider, Matthew (AG); Gadola, Michael (GOV); Steven G. Howell; Clinton, Kevin (TREASURY)	Brader, Valerie (GOV)	Lukasz Paszek ; Chris DeRose (CDeRose@mersofmich.com); Stoddard, Phil (DTMB)	3/11/2014	CONFIDENTIAL AND SUBJECT TO MEDIATION ORDER – Discount Rate Backgrounder	Mediation	Document/email discussing a subject incident to mediation
PRIV_000363	Clinton, R. Kevin	Brader, Valerie (GOV)	Lukasz Paszek	Schneider, Matthew (AG); Gadola, Michael (GOV); Steven G. Howell; Clinton, Kevin (TREASURY); Chris DeRose (CDeRose@mersofmich.com); Stoddard, Phil (DTMB)	3/12/2014	RE: CONFIDENTIAL AND SUBJECT TO MEDIATION ORDER – Discount Rate Backgrounder	Mediation	Document/email discussing a subject incident to mediation

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000364	Clinton, R. Kevin	Clinton, Kevin (TREASURY); Stibitz, Brom (Treasury); Saxton, Thomas (Treasury); Tedder, Greg (GOV); orrk@detroitmi.gov; mayss@detroitmi.gov; Bill Nowling: Gelisse, Ashley (TREASURY); Brader, Valerie (GOV); stacy Fox	Jeffrey B Ellman	Charles M.Moore; gaurav.malhotra@ey.com; ken.buckfire@millerbuckfire.com; David G. Heiman; Corinne Ball; Heather Lennox; Bruce Bennett	4/20/2014	City of Detroit Restructuring – Weekly E-Mail Update	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product; Document/email containing communication with attorney
PRIV_000365	Clinton, R. Kevin	Clinton, Kevin (TREASURY); Stibitz, Brom (Treasury); Saxton, Thomas (Treasury); Tedder, Greg (GOV); orrk@detroitmi.gov; PennSh@detroitmi.gov; mayss@detroitmi.gov; Bill Nowling; Gelisse, Ashley (TREASURY); Brader, Valerie (GOV); stacy Fox	Jeffrey B Ellman	Charles M.Moore; gaurav.malhotra@ey.com; ken.buckfire@millerbuckfire.com; David G. Heiman; Corinne Ball; Heather Lennox; Bruce Bennett	11/9/2013	City of Detroit Restructuring – Weekly E-Mail Update	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product; Document/email containing communication with attorney
PRIV_000366	Clinton, R. Kevin	emiller@jonesday.com'; Flood, Ann (DIFS) ; Clinton, Kevin (TREASURY)	Simons, Samantha (GOV)		11/14/2013	RE: DO NOT FORWARD Mediation re pensions	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000367	Clinton, R. Kevin	Gelisse, Ashley (TREASURY); Saxton, Thomas (Treasury); Chris DeRose (CDeRose@mersofmich.com)	Tedder, Greg (GOV)	Brader, Valerie (GOV)	12/20/2013	FW: CONFIDENTIAL DRAFT SLIDE DECK FOR MEDIATORS Pension POA.pptx	Mediation	Document/email discussing a subject incident to mediation
PRIV_000368	Clinton, R. Kevin	Gelisse, Ashley (TREASURY); Priest, Chris (GOV)	Tedder, Greg (GOV)	Brader, Valerie (GOV)	12/20/2013	FW: Detroit Retiree Health Population & Medicare	Common Interest Agreement	Document/email containing communication with attorney
PRIV_000369	Clinton, R. Kevin	Clinton, Kevin (TREASURY); Stibitz, Brom (Treasury); Saxton, Thomas (Treasury); Tedder, Greg (GOV); orrk@detroitmi.gov; mayss@detroitmi.gov; Bill Nowling; Gelisse, Ashley (TREASURY); Brader, Valerie (GOV); stacy Fox; PennS1@michigan.gov	Jeffrey B Ellman	Charles M.Moore; gaurav.malhotra@ey.com; ken.buckfire@millerbuckfire.com; David G. Heiman; Corinne Ball; Heather Lennox; Bruce Bennett	12/21/2013	City of Detroit Restructuring – Weekly E-Mail Update	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product; Document/email containing communication with attorney
PRIV_000370	Clinton, R. Kevin	Clinton, Kevin (TREASURY); Saxton, Thomas (Treasury); Tedder, Greg (GOV); Vanden Bosch, Kerrie (DTMB); CDeRose@mersofmich.com; Stoddard, Phil (DTMB)	Brader, Valerie (GOV)		12/23/2013	Detroit Bankruptcy	Mediation	Document/email discussing a subject incident to mediation
PRIV_000371	Clinton, R. Kevin						Mediation	Document/email discussing a subject incident to mediation

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000372	Clinton, R. Kevin	Stoddard, Phil (DTMB); Vanden Bosch, Kerrie (DTMB); CDeRose@mersofmich.com; Clinton, Kevin (TREASURY); Saxton, Thomas (Treasury); Tedder, Greg (GOV); lukasz@paszek.com	Brader, Valerie (GOV)		12/23/2013	Detroit Mediation Confidential	Mediation	Document/email discussing a subject incident to mediation
PRIV_000373	Clinton, R. Kevin				12/23/2013	PDF/Police and fire retirement system of the city of Detroit executive summary	Mediation	Document/email discussing a subject incident to mediation
PRIV_000374	Clinton, R. Kevin	Clinton, Kevin (TREASURY)	Gelisse, Ashley (TREASURY)		12/23/2013	FW: Mediation Agenda - confidential correspondence covered under mediation discussion	Mediation	Document/email discussing a subject incident to mediation
PRIV_000375	Clinton, R. Kevin	Gelisse, Ashley (TREASURY); Clinton, Kevin (TREASURY)	Vanden Bosch, Kerrie (DTMB)	Stoddard, Phil (DTMB) ; Brader, Valerie (GOV)	12/23/2013	Confidential correspondence covered under mediation discussion - Materials regarding Detroit	Mediation	Document/email discussing a subject incident to mediation
PRIV_000376	Clinton, R. Kevin				12/23/2013	ORS Pension Plan Comparison	Mediation	Document/email discussing a subject incident to mediation
PRIV_000377	Clinton, R. Kevin				1/13/2014	Project Piston 40 Year Plan - Preliminary Draft	Mediation	Document/email discussing a subject incident to mediation
PRIV_000378	Clinton, R. Kevin	Tedder, Greg (GOV); Brader, Valerie (GOV); Gadola, Michael (GOV)	Saxton, Thomas (Treasury)	Clinton, Kevin (TREASURY) ; Rustem, William (GOV)	12/26/2013	FW: DWSD Alternative Organization Structures	Attorney Client Communication	Document/email containing communication with attorney
PRIV_000379	Clinton, R. Kevin	Brader, Valerie (GOV); Clinton, Kevin (TREASURY); 'lukasz@paszek.com'; Saxton, Thomas (Treasury); Stoddard, Phil (DTMB)	Tedder, Greg (GOV)		1/2/2014	RE: Detroit mediation – confidential – pensions	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000380	Clinton, R. Kevin	Clinton, Kevin (TREASURY)	Gelisse, Ashley (TREASURY)	Saxton, Thomas (Treasury)	1/6/2014	FW: Data Extracts - confidential correspondence covered under mediation discussion	Mediation	Document/email discussing a subject incident to mediation
PRIV_000381	Clinton, R. Kevin	Clinton, Kevin (TREASURY)	Lukasz Paszek	Stoddard, Phil (DTMB); Crippen, Steve (DTMB); Herbach, Michael (DTMB)	1/8/2014	RE: Data request priorities for Milliman	Mediation	Document/email discussing a subject incident to mediation
PRIV_000382	Clinton, R. Kevin	Saxton, Thomas (Treasury); Clinton, Kevin (TREASURY)	Brader, Valerie (GOV)	Gadola, Michael (GOV) ; Gelisse, Ashley (TREASURY)	1/10/2014	Cost of "Detroit premium"	Attorney Client Communication	Document/email containing communication with attorney
PRIV_000383	Clinton, R. Kevin	Snyder, Rick (GOV); Muchmore, Dennis (GOV); Roberts, John (GOV); Brader, Valerie (GOV); "lukasz@paszek.com"; Priest, Chris (GOV); Saxton, Thomas (Treasury); Rustem, William (GOV); Clinton, Kevin (TREASURY)	Tedder, Greg (GOV)	Wisniewski, Wendy (GOV) ; Scott, Allison (GOV)	1/13/2014	FW: Draft POA Slides	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000384	Clinton, R. Kevin	Lukasz Paszek ; Clinton, Kevin (TREASURY) ; Saxton, Thomas (Treasury) ; Gadola, Michael (GOV)	Brader, Valerie (GOV)		1/13/2014	CONFIDENTIAL, SUBJECT TO MEDIATION ORDER AND COMMON INTEREST AGREEMENT	Attorney Client Communication; Common Interest Agreement; Mediation	
PRIV_000385	Clinton, R. Kevin				1/13/2014	Project Piston 40 Year Plan - Preliminary Draft	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000386	Clinton, R. Kevin	Posthumus, Dick (GOV); Wurfel, Sara (GOV); Roberts, John (GOV); Muchmore, Dennis (GOV); Ackerman, Darin (GOV); Durfee, Sally (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV); Clinton, Kevin (TREASURY); Posthumus, Dick (GOV)	Scott, Allison (GOV)		1/15/2014	RE: talking points for caucus meetings tomorrow	Mediation	Document/email discussing a subject incident to mediation
PRIV_000387	Clinton, R. Kevin	Clinton, Kevin (TREASURY); Stibitz, Brom (Treasury) >; Saxton, Thomas (Treasury); Tedder, Greg (GOV); orrk@detroitmi.gov; mayss@detroitmi.gov; Bill Nowling; Gelisse, Ashley (TREASURY); Brader, Valerie (GOV); stacy Fox; PennS1@michigan.gov	Jeffrey B Ellman	Charles M.Moore ; gaurav.malhotra@ey.com; ken.buckfire@millerbuckfire.com; David G. Heiman ; Corinne Ball ; Heather Lennox ; Bruce Bennett	1/17/2014	City of Detroit Restructuring – Weekly E-Mail Update	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product; Document/email containing communication with attorney
PRIV_000388	Clinton, R. Kevin	Clinton, Kevin (TREASURY); Stibitz, Brom (Treasury); Saxton, Thomas (Treasury); Tedder, Greg (GOV); orrk@detroitmi.gov; mayss@detroitmi.gov, Bill Nowling; Gelisse, Ashley (TREASURY); Brader, Valerie (GOV); stacy Fox; PennS1@michigan.gov	Jeffrey B Ellman	Charles M.Moore ; gaurav.malhotra@ey.com; ken.buckfire@millerbuckfire.com; David G. Heiman ; Corinne Ball ; Heather Lennox ; Bruce Bennett	1/24/2014	City of Detroit Restructuring – Weekly E-Mail Update	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product; Document/email containing communication with attorney
PRIV_000389	Clinton, R. Kevin	Clinton, Kevin (TREASURY); Lukasz Paszek; Priest, Chris (GOV)	Brader, Valerie (GOV)		1/29/2014	Fwd: CONFIDENTIAL - Detroit - Draft Plan of Adjustment	Attorney Client Communication; Common Interest Agreement	Document/email containing communication with attorney
PRIV_000390	Clinton, R. Kevin	Clinton, Kevin (TREASURY); Stibitz, Brom (Treasury); Saxton, Thomas (Treasury); Tedder, Greg (GOV); orrk@detroitmi.gov; mayss@detroitmi.gov; Bill Nowling; Gelisse, Ashley (TREASURY); Brader, Valerie (GOV); stacy Fox	Jeffrey B Ellman	Charles M.Moore ; gaurav.malhotra@ey.com; ken.buckfire@millerbuckfire.com; David G. Heiman ; Corinne Ball ; Heather Lennox ; Bruce Bennett	1/31/2014	City of Detroit Restructuring – Weekly E-Mail Update	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product; Document/email containing communication with attorney
PRIV_000391	Clinton, R. Kevin	Clinton, Kevin (TREASURY); Stibitz, Brom (Treasury) >; Saxton, Thomas (Treasury); Tedder, Greg (GOV); orrk@detroitmi.gov; mayss@detroitmi.gov; Bill Nowling; Gelisse, Ashley (TREASURY); Brader, Valerie (GOV); stacy Fox	Jeffrey B Ellman	Charles M.Moore; gaurav.malhotra@ey.com; ken.buckfire@millerbuckfire.com; David G. Heiman; Corinne Ball; Heather Lennox; Bruce Bennett	2/7/2014	City of Detroit Restructuring – Weekly E-Mail Update	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product; Document/email containing communication with attorney

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000392	Clinton, R. Kevin	Snyder, Rick (GOV)	Brader, Valerie (GOV)	Gadola, Michael (GOV); Saxton, Thomas (Treasury); Tedder, Greg (GOV); Muchmore, Dennis (GOV); Ellison, Melanie (GOV); Scott, Allison (GOV); Clement, Elizabeth (GOV); Clinton, Kevin (TREASURY); Clinton, Kevin (TREASURY); Roberts, John (GOV); lukasz@paszek.com; Priest, Chris (GOV)	2/14/2014	FW: Detroit - Financials	Attomey Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000393	Clinton, R. Kevin	Brader, Valerie (GOV); Gadola, Michael (GOV); 'lukasz@paszek.com'; Priest, Chris (GOV); Clinton, Kevin (TREASURY); Saxton, Thomas (Treasury)	Tedder, Greg (GOV)		2/20/2014	FW: Detroit - Draft Plan/Disclosure Statement/Summary	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000394	Clinton, R. Kevin				2/20/2014	Draft of disclosure statement with respect to the plan for the adjustment of debts of the city of Detroit	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_000395	Clinton, R. Kevin	Tedder, Greg (GOV); Agen, Jarrod (GOV); Wurfel, Sara (GOV); Snyder, Rick (GOV); Scott, Allison (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Roberts, John (GOV); Clinton, Kevin (TREASURY); Saxton, Thomas (Treasury)	Brader, Valerie (GOV)		2/20/2014	Fwd: Plan of Adjustment CONFIDENTIAL – SUBJECT TO CI AND MEDIATION ORDER	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000396	Clinton, R. Kevin	Snyder, Rick (GOV); Scott, Allison (GOV); Gadola, Michael (GOV); Brader, Valerie (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Roberts, John (GOV); Rustem, William (GOV); Clinton, Kevin (TREASURY); Saxton, Thomas (Treasury); Lukasz Paszek; Priest, Chris (GOV); Chris DeRose (CDeRose@mersofmich.com); Stoddard, Phil (DTMB); Agen, Jarrod (GOV); Wurfel, Sara (GOV); Baird, Richard (GOV); Posthumus, Dick (GOV); Durfee, Sally (GOV); Ackerman, Darin (GOV)	Tedder, Greg (GOV)	Wisniewski, Wendy (GOV)	2/21/2014	FW: Detroit - Plan of Adjustment and Disclosure Statement (As-Filed)	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000397	Clinton, R. Kevin	Clinton, Kevin (TREASURY); Stibitz, Brom (Treasury); Saxton, Thomas (Treasury); Tedder, Greg (GOV); orrk@detroitmi.gov; mayss@detroitmi.gov; Bill Nowling; Gelisse, Ashley (TREASURY); Brader, Valerie (GOV); stacy Fox	Jeffrey B Ellman	Charles M.Moore ; gaurav.malhotra@ey.com; ken.buckfire@millerbuckfire.com; David G. Heiman ; Corinne Ball ; Heather Lennox ; Bruce Bennett	3/8/2014	City of Detroit Restructuring – Weekly E-Mail Update	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product; Document/email containing communication with attorney

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Dafe	Subject 3	Privilege Type	Privilege Descriptions
PRIV_000398	Clinton, R. Kevin	Brader, Valerie (GOV); Schneider, Matthew (AG); Steven G. Howell; Clinton, Kevin (TREASURY)	Gadola, Michael (GOV)	Lukasz Paszek ; Chris DeRose (CDeRose@mersofmich.com); Stoddard, Phil (DTMB)	3/12/2014	RE: CONFIDENTIAL AND SUBJECT TO MEDIATION ORDER – Discount Rate Backgrounder	Mediation	Document/email discussing a subject incident to mediation
PRIV_000399	Clinton, R. Kevin				3/24/2014	Letter between Valerie Brader and Heather Lennox regarding compensation claims in the proposed plan for adjustment	Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_000400	Clinton, R. Kevin	Saxton, Thomas (Treasury) ; Clinton, Kevin (TREASURY)	Brader, Valerie (GOV)		3/28/2014	FW: #22035825v3 <active> - Detroit - City Revised Draft UTGO Term Sheet 3/25- #22035825v4<active> - Detroit - City Revised Draft UTGO Term Sheet 3/25</active></active>	Attomey Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000401	Clinton, R. Kevin				3/25/2014	Attachment/Term sheet for plan treatment of UTGO bond claims and related insurer claims.	Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_000402	Clinton, R. Kevin	Muchmore, Dennis (GOV); Roberts, John (GOV); Tedder, Greg (GOV); Brader, Valerie (GOV); Rustem, William (GOV); Priest, Chris (GOV); Clinton, Kevin (TREASURY); 'Lukasz Paszek'	Scott, Allison (GOV)	Snyder, Rick (GOV)	12/30/2013	updated status for call tomorrow at 10 a.m. re Detroit/Mediation	Mediation	Document/email discussing a subject incident to mediation
PRIV_000403	Clinton, R. Kevin	Muchmore, Dennis (GOV)	Brader, Valerie (GOV)	Scott, Allison (GOV); Tedder, Greg (GOV); Priest, Chris (GOV); Clinton, Kevin (TREASURY); Roberts, John (GOV) ; Rustern, William (GOV); Snyder, Rick (GOV)	12/31/2013	Re: For tomorrow	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000404	Clinton, R. Kevin	Saxton, Thomas (Treasury); Rustem, William (GOV)	Brader, Valerie (GOV)	Clinton, Kevin (TREASURY)	12/31/2013	RE: UTGO proceeds	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000405	Clinton, R. Kevin	Snyder, Rick (GOV)	Brader, Valerie (GOV)	Calley, Brian (GOV); Muchmore, Dennis (GOV); Clinton, Kevin (TREASURY); Stoddard, Phil (DTMB); Vanden Bosch, Kerrie (DTMB); lukasz@paszek.com; Tedder, Greg (GOV); Saxton, Thomas (Treasury)	1/2/2014	Detroit mediation – confidential – pensions	Mediation	Document/email discussing a subject incident to mediation
PRIV_000406	Clinton, R. Kevin	Clinton, Kevin (TREASURY)	Brader, Valerie (GOV)		1/6/2014	FW: Detroit bankruptcy - CONFIDENTIAL AND SUBJECT TO MEDIATION ORDER	Mediation	Document/email discussing a subject incident to mediation
PRIV_000407	Clinton, R. Kevin	Snyder, Rick (GOV)	Brader, Valerie (GOV)	Scott, Allison (GOV); Lukasz Paszek; Clinton, Kevin (TREASURY); Tedder, Greg (GOV); Gadola, Michael (GOV)	1/7/2014	Term Sheet for Plan Treatment of UTGO Bond Claims	Mediation	Document/email discussing a subject incident to mediation
PRIV_000408	Clinton, R. Kevin				1/7/2014	Existing Provisions and proposals for new hires going forward	Mediation	Document/email discussing a subject incident to mediation
PRIV_000409	Clinton, R. Kevin	lukasz@paszek.com; Clinton, Kevin (TREASURY)	Herbach, Michael (DTMB)	Stoddard, Phil (DTMB) ; Crippen, Steve (DTMB)	1/8/2014	Data request priorities for Milliman	Mediation	Document/email discussing a subject incident to mediation
PRIV_000410	Clinton, R. Kevin				1/8/2014	CLEAR plan requests	Mediation	Document/email discussing a subject incident to mediation
PRIV_000411	Clinton, R. Kevin	Brader, Valerie (GOV)	Lukasz Paszek	Stoddard, Phil (DTMB); Crippen, Steve (DTMB); Herbach, Michael (DTMB); Clinton, Kevin (TREASURY)	1/8/2014	Milliman request prioritization / Subject to mediation order	Mediation	Document/email discussing a subject incident to mediation
PRIV_000412	Clinton, R. Kevin	Evan Miller	Brader, Valerie (GOV)	Lukasz Paszek ; Clinton, Kevin (TREASURY) ; Stoddard, Phil (DTMB)	1/9/2014	FW: Milliman request prioritization / Subject to mediation order and common interest	Common Interest Agreement; Mediation	Document/email discussing a subject incident to mediation
PRIV_000413	Clinton, R. Kevin	Brader, Valerie (GOV) ; Tedder, Greg (GOV)	Saxton, Thomas (Treasury)	Clinton, Kevin (TREASURY); Rustem, William (GOV)	1/13/2014	FW: Milliman Letter	Mediation	Document/email discussing a subject incident to mediation

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions 15
PRIV_000414	Dillon, Andy	cgannon@conwaymackenzie.com; ; cmoore@conwaymackenzie.com; khand@conwaymackenzie.com; Jan Anderson <jan@detroitmi.gov>; Gaurav.Malhotra@ey.com; Juan.Santambrogio@ey.com; Dillon, Andy (Treasury); Saxton, Thomas (Treasury); Stibitz, Brom (Treasury); stib</jan@detroitmi.gov>	Cherie Polk	Hichez, Amy (Treasury) ; Pleyte, Beth (Treasury)	2/7/2013	OPEB/Pension workplan v2.0	Common Interest Agreement	Document/email containing communication with attorney
PRIV_000415	Dillon, Andy				2/7/2013	Medical Benefits (OPEB) action work plan	Common Interest Agreement	Document/email containing communication with attorney
PRIV_000416	Dillon, Andy				2/27/2014	RE: City of Detroit	Deliberative process	Email containing pre-decisional deliberations
PRIV_000417	Dillon, Andy				2/28/2012	City of Detroit Financial Review team notes	Deliberative process	Email containing pre-decisional deliberations
PRIV_000418	Dillon, Andy	Gaurav.Malhotra@ey.com; Dillon, Andy (Treasury); Tedder, Greg (GOV); Stibitz, Brom (Treasury) >; David G. Heiman; Doak, James <james.doak@millerbuckfire.com>; ken.buckfire@millerbuckfire.com; orrk@detroitmi.gov; Saxton, Thomas (Treasury)</james.doak@millerbuckfire.com>	Heather Lennox		5/9/2013	Draft 45-day plan - Detroit	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product; Document/email containing communication with attorney
PRIV_000419	Dillon, Andy	Dillon, Andy (Treasury); Stibitz, Brom (Treasury) >; Saxton, Thomas (Treasury)	Tedder, Greg (GOV)		5/10/2013	FW: Documents Related to 45-day Plan	Attorney Client Communication; Common Interest Agreement	Document/email containing communication with attorney
PRIV_000420	Dillon, Andy				5/14/2013	Internal discussion materials regarding the debtor-in- possession financing for Detroit	Common Interest Agreement; Attorney Work Product	Document/email containing communication with attomey; Email containing pre-decisional deliberations

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000421	Dillon, Andy	Dillon, Andy (Treasury)	Heather Lennox	Tedder, Greg (GOV); mayss@detroitmi.gov; Durfee, Sally (GOV); Keilen, Alison (GOV); Ackerman, Darin (GOV); senmhood@senate.mi.gov; senbjohnson@senate.mi.gov; senvsmitth@senate.mi.gov; sencyoung@senate.mi.gov; bbanks@house.mi.gov; fdurhal@house.mi.gov; dnathan@house.mi.gov; harveysantana@house.mi.gov; tstallworth@house.mi.gov; harveysantana@house.mi.gov; tstallworth@house.mi.gov; rosemaryrobinson@house.mi.gov; Stibitz, Brom (Treasury); Saxton, Thomas (Treasury); David G. Heiman; Corinne Ball; Bruce Bennett; ken.buckfire@millerbuckfire.com; Doak, James - Games.doak@millerbuckfire.com; gaurav.malhotra@ey.com; daniel.jemeycic@ey.com; Juan.Santambrogio@ey.com; Jeffrey B Ellman; cmoore@conwaymackenzie.com; orrk@detroitmi.gov; PennSh@detroitmi.gov; NowlingB@detroitmi.gov; Koryzno, Edward (Treasury); fraserr1@michigan.gov	7/15/2013	Quarterly Report for the City of Detroit	Common Interest Agreement; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_000422	Dillon, Andy	Dillon, Andy (Treasury)	Heather Lennox	Tedder, Greg (GOV); mayss@detroitmi.gov; Durfee, Sally (GOV); Keilen, Alison (GOV); Ackerman, Darin (GOV); senmhood@senate.mi.gov; senbjohnson@senate.mi.gov; senvsmith@senate.mi.gov; sencyoung@senate.mi.gov; bbanks@house.mi.gov; fdurhal@house.mi.gov; dhathan@house.mi.gov; ohnolumba@house.mi.gov; harveysantana@house.mi.gov; tstallworth@house.mi.gov; albertatalabi@house.mi.gov; tstallworth@house.mi.gov; rosemaryrobinson@house.mi.gov; Stibitz, Brom (Treasury) >; Saxton, Thomas (Treasury); David G. Heiman; Corinne Ball; Bruce Bennett; ken.buckfire@millerbuckfire.com; Doak, James <james.doak@millerbuckfire.com; (treasury);="" b="" cmoore@conwaymackenzie.com;="" daniel.jemeycic@ey.com;="" edward="" ellman;="" fraserr1@michigan.gov;="" gaurav.malhotra@ey.com;="" jeffrey="" juan.santambrogio@ey.com;="" koryzno,="" orrk@detroitmi.gov;="" philicavanagh@house.mi.gov;="" senthunter@senate.mi.gov<="" td=""><td>10/15/2013</td><td>Quarterly Report for the City of Detroit</td><td>Common Interest Agreement; Mediation</td><td>Document/email containing communication with attorney; Document/email discussing a subject incident to mediation</td></james.doak@millerbuckfire.com;>	10/15/2013	Quarterly Report for the City of Detroit	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000423	Dillon, Andy	Saxton, Thomas (Treasury); Stibitz, Brom (Treasury) >; Headen, Frederick (Treasury)	Dillon, Andy (Treasury)		7/9/2013	Fwd: Detroit Pension Meeting/Conference Call at 4:15	Common Interest Agreement	Document/email containing communication with attorney
PRIV_000424	Dillon, Andy	Headen, Frederick (Treasury)	Dillon, Andy (Treasury)	Saxton, Thomas (Treasury); Stibitz, Brom (Treasury) >; Baird, Richard (GOV)	7/9/2013	Re: Detroit Pension Meeting/Conference Call at 4:15	Common Interest Agreement	Document/email containing communication with attorney
PRIV_000425	Dillon, Andy				4/17/2013	Jones Day and Miller Canfield regarding pension obligations.	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product; Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000426	Dillon, Andy				4/18/2013	Adjusted funded state under PA436 Section 12(1)(m) for DGRS and reflecting value of pension obligation certificates	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product; Document/email containing communication with attorney
PRIV_000427	Dillon, Andy		A		4/17/2013	Supplemental analysis of City of Detroit retiree h	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product; Document/email containing communication with attorney

rivileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000428	Dillon, Andy	Dillon, Andy (Treasury); Tedder, Greg (GOV); Gadola, Michael (GOV); Brader, Valerie (GOV); Baird, Richard (GOV); Muchmore, Dennis (GOV); Roberts, John (GOV)	Saxton, Thomas (Treasury)	Hichez, Amy (Treasury) ; Gelisse, Ashley (TREASURY)	9/28/2013	DIP	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Deliberative process	Document/email containing attorney work product Document/email containing communication with attorney; Email containing pre-decisional deliberations
PRIV_000429	Dillon, Andy				8/26/2013	post petion financing discussion worksheet	Attomey Client Communication; Common Interest Agreement; Attorney Work Product; Deliberative process	Document/email containing attorney work product Document/email discussing a subject incident to mediation; Email containing pre-decisional deliberations
PRIV_000430	Dillon, Andy				8/26/2013	Draft post petition financing timeline	Attomey Client Communication; Common Interest Agreement; Attomey Work Product; Deliberative process	Document/email containing attorney work product Document/email discussing a subject incident to mediation; Email containing pre-decisional deliberations
PRIV_000431	Gadola, Michael	Doctoroff, Andrew (MEDC) <doctoroffa@michigan.org></doctoroffa@michigan.org>	Brader, Valerie (GOV)	Gadola, Michael (GOV); Steudle, Kirk (MDOT); Alghurabi, Mohammed S. (MDOT); McNeil, Ryan (MLB); DeLong, Matt W. (MDOT); Jordan, Mark (MDOT)	12/3/2013	Re: Final List of Detroit Properties to Buy	Mediation	Document/email discussing a subject incident to mediation
PRIV_000432	Gadola, Michael	Flancher, Steven (AG) ; Steven G. Howell ; Gadola, Michael (GOV)	Brader, Valerie (GOV)	Schneider, Matthew (AG) ; Peter H. Ellsworth ; Kester K. So ; Nelson, Margaret (AG) ; Lindstrom, Aaron (AG)	12/13/2013	RE: Next steps - Privileged and Confidential/Subject to Attorney-Client and Work Product Privilege	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000433	Gadola, Michael	Gadola, Michael (GOV)	Brader, Valerie (GOV)		12/13/2013	RE: Next steps - Privileged and Confidential/Subject to Attorney-Client and Work Product Privilege	Attorney Client Communication; Attorney Work Product	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000434	Gadola, Michael	Schneider, Matthew (AG)	Steven G. Howell	Gadola, Michael (GOV); Brader, Valerie (GOV); Flancher, Steven (AG); Peter H. Ellsworth; Kester K. So; Nelson, Margaret (AG); Lindstrom, Aaron (AG)	12/14/2013	Re: Next steps - Privileged and Confidential/Subject to Attorney-Client and Work Product Privilege	Attorney Client Communication; Attorney Work Product	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000435	Gadola, Michael	Gadola, Michael (GOV)	Brader, Valerie (GOV)		12/17/2013	Fwd: Fund to Support Detroit Retirees, Cultural Heritage and Revitalization	Mediation	Document/email discussing a subject incident to mediation
PRIV_000436	Gadola, Michael	Gadola, Michael (GOV)	Evan Miller	Stacy Fox ; Heather Lennox ; Tedder, Greg (GOV)	12/19/2013	Re: SBs 541-545	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject lincident to mediation
PRIV_000437	Gadola, Michael	Wurfel, Sara (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV); Agen, Jarrod (GOV); Roberts, John (GOV); Gadola, Michael (GOV); Posthumus, Dick (GOV); Durfee, Sally (GOV)	Muchmore, Dennis (GOV)	Scott, Allison (GOV) ; Wisniewski, Wendy (GOV)	1/22/2014	RE: HIGH PRIORITY Draft Detroit news release	Mediation	Document/email discussing a subject incident to mediation
PRIV_000438	Gadola, Michael	Gadola, Michael (GOV)	Schneider, Matthew (AG)		1/22/2014	Re: Questions from the SML	Mediation	Document/email discussing a subject incident to mediation
PRIV_000439	Gadola, Michael	Gadola, Michael (GOV); Schneider, Matthew (AG); Brader, Valerie (GOV)	Jennifer Dettloff		1/22/2014	RE: Questions from the SML	M ediation	Document/email discussing a subject incident to mediation
PRIV_000440	Gadola, Michael	Brader, Valerie (GOV); Gadola, Michael (GOV); Tedder, Greg (GOV); Agen, Jarrod (GOV); Wurfel, Sara (GOV); Roberts, John (GOV); Posthumus, Dick (GOV); Durfee, Sally (GOV)	Muchmore, Dennis (GOV)	Scott, Allison (GOV) ; Wisniewski, Wendy (GOV)	1/22/2014	RE: HIGH PRIORITY Draft Detroit news release	Mediation	Document/email discussing a subject incident to mediation
PRIV_000441	Gadola, Michael	Tedder, Greg (GOV) ; Gadola, Michael (GOV) ; Lukasz Paszek	Brader, Valerie (GOV)		1/24/2014	RE: [Detroit] Summary - Plan of Adjustment	Mediation	Document/email discussing a subject incident to mediation
PRIV_000442	Gadola, Michael	Snyder, Rick (GOV)	Brader, Valerie (GOV)	Gadola, Michael (GOV); Tedder, Greg (GOV)	1/27/2014	Fwd: DetroitPlan of Adjustment	Mediation	Document/email discussing a subject incident to mediation

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000443	Gadola, Michael	Gadola, Michael (GOV)	West, Samantha (GOV)		1/27/2014	RE: DetroitPlan of Adjustment	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000444	Gadola, Michael	Gadola, Michael (GOV)	West, Samantha (GOV)		1/27/2014	RE: DetroitPlan of Adjustment	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000445	Gadola, Michael	Steven G. Howell'; Flancher, Steven (AG); Gadola, Michael (GOV); Schneider, Matthew (AG)	Brader, Valerie (GOV)	Allison R. Bach ; Dawn R. Copley ; Kester K. So ; Peter H. Ellsworth	1/28/2014	RE: *Confidential: Re: State's Comments to Draft Plan of Adjustment/Privileged and Confidential per Mediation Order and Common Interest Agreement	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000446	Gadola, Michael	Gadola, Michael (GOV)	Schneider, Matthew (AG)	Brader, Valerie (GOV); Steven G. Howell; Flancher, Steven (AG); Allison R. Bach; Dawn R. Copley; Kester K. So; Peter H. Ellsworth	1/28/2014	Re: *Confidential: Re: State's Comments to Draft Plan of Adjustment/Privileged and Confidential per Mediation Order and Common Interest Agreement	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000447	Gadola, Michael	Heather Lennox	Brader, Valerie (GOV)	Saxton, Thomas (Treasury) ; Gadola, Michael (GOV)	2/5/2014	CONFIDENTIAL, SUBJECT TO MEDIATION ORDER AND COMMON INTEREST AGREEMENT: Request for Treasury	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing attorney work product Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000448	Gadola, Michael	Gadola, Michael (GOV); Brader, Valerie (GOV); Schneider, Matthew (AG)	Brock Swartzle	Brian Mills ; Scott Starr, Travis Weber	2/26/2014	Bankruptcy	Mediation	Document/email discussing a subject incident to mediation
PRIV_000449	Gadola, Michael				2/25/2014	First Amended Order establishing procedures, deadlines, and hearing dates relating to the debtor's plan of adjustment		Document/email discussing a subject incident to mediation
PRIV_000450	Gadola, Michael	Gadola, Michael (GOV); Brader, Valerie (GOV); Schneider, Matthew (AG)	Brock Swartzle	Brian Mills ; Scott Starr, Travis Weber	2/26/2014	RE: Bankruptcy	Mediation	Document/email discussing a subject incident to mediation
PRIV_000451	Gadola, Michael	Brader, Valerie (GOV)	Allison R. Bach	Gadola, Michael (GOV) ; West, Samantha (GOV)	2/26/2014	RE: Order Establishing Procedures Related to Plan and Disclosure Statement	Mediation	Document/email discussing a subject incident to mediation
PRIV_000452	Gadola, Michael	Gadola, Michael (GOV)	Brock Swartzle	Brader, Valerie (GOV); Schneider, Matthew (AG); Brian Mills; Travis Weber; Scott Starr	2/26/2014	Re: Mediation Confidential – memo regarding enjoining non-consenting retirees from suing the State	Mediation	Document/email discussing a subject incident to mediation
PRIV_000453	Gadola, Michael	Gadola, Michael (GOV); Brader, Valerie (GOV); Schneider, Matthew (AG)	Brock Swartzle	Brian Mills ; Scott Starr, Travis Weber	2/26/2014	RE: Bankruptcy	Mediation	Document/email discussing a subject incident to mediation
PRIV_000454	Gadola, Michael	Gadola, Michael (GOV); Brader, Valerie (GOV); Schneider, Matthew (AG)	Brock Swartzle	Brian Mills ; Scott Starr; Travis Weber	2/26/2014	RE: Bankruptcy	Mediation	Document/email discussing a subject incident to mediation
PRIV_000455	Gadola, Michael	Gadola, Michael (GOV)	Brock Swartzle	Brader, Valerie (GOV); Schneider, Matthew (AG); Brian Mills; Travis Weber; Scott Starr	2/26/2014	RE: Mediation Confidential – memo regarding enjoining non-consenting retirees from suing the State	Mediation	Document/email discussing a subject incident to mediation
PRIV_000456	Gadola, Michael	Gadola, Michael (GOV)	Schneider, Matthew (AG)	Brock Swartzle; Brader, Valerie (GOV); Brian Mills; Travis Weber; Scott Starr	2/27/2014	Re: Mediation Confidential – memo regarding enjoining non-consenting retirees from suing the State	Mediation	Document/email discussing a subject incident to mediation
PRIV_000457	Gadola, Michael	Gadola, Michael (GOV)	Brader, Valerie (GOV)		2/27/2014	Re: Mediation Confidential – memo regarding enjoining non-consenting retirees from suing the State	Mediation	Document/email discussing a subject incident to mediation
PRIV_000458	Gadola, Michael	Schneider, Matthew (AG); Neison, Margaret (AG); Flancher, Steven (AG); Gadola, Michael (GOV); Brader, Valerie (GOV); Gustafson, Holly (AG)	Steven G. Howell	Kester K. So ; Peter H. Ellsworth ; Dawn R. Copley ; Allison R. Bach	2/27/2014	RE: Order Establishing Procedures Related to Plan and Disclosure Statement	Mediation	Document/email discussing a subject incident to mediation

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000459	Gadola, Michael	Steven G. Howell	Schneider, Matthew (AG)	Nelson, Margaret (AG); Flancher, Steven (AG); Gadola, Michael (GOV); Brader, Valerie (GOV); Gustafson, Holly (AG); Kester K. So; Peter H. Ellsworth; Dawn R. Copley; Allison R. Bach	2/28/2014	Re: Order Establishing Procedures Related to Plan and Disclosure Statement	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000460	Gadola, Michael	Saxton, Thomas (Treasury) ; Brader, Valerie (GOV)	Kester K. So	Gadola, Michael (GOV) ; Schneider, Matthew (AG) ; Steven G. Howell	2/28/2014	RE: Detroit Financing Transaction Documents	Attorney Client Communication; Common Interest Agreement	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000461	Gadola, Michael	Gadola, Michael (GOV)	Steven G. Howell		3/7/2014	RE: Individual Retiree Objections to the Plan	Mediation	Document/email discussing a subject incident to mediation
PRIV_000462	Gadola, Michael	Schneider, Matthew (AG) ; Steven G. Howell	Brader, Valerie (GOV)	Gadola, Michael (GOV) ; Kester K. So ; Peter H. Ellsworth ; Dawn R. Copley ; Allison R. Bach	3/11/2014	RE: Conditions and Income Stabilization Payment	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000463	Gadola, Michael	Posthumus, Dick (GOV)	Brader, Valerie (GOV)	Gadola, Michael (GOV) ; Tedder, Greg (GOV)	3/17/2014	RE: Detroit Bankruptcy Stakeholders Meeting		Document/email discussing a subject incident to mediation
PRIV_000464	Gadola, Michael	'Juan.Santambrogio@ey.com'; lukasz@paszek.com	Brader, Válerie (GOV)	dgheiman@JonesDay.com; emiller@JonesDay.com; hlennox@jonesday.com; Jonathan.Siegel@ey.com; OrrK@detroitmi.gov; Gaurav.Malhotra@ey.com; Priest, Chris (GOV)	4/15/2014	RE: Fw: Estimated Retiree Stabilization Payments (including 20-year projections)	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000465	Gadola, Michael	Gadola, Michael (GOV); Kevyn Orr; 'Stacy Fox; David G. Heiman; Heather Lennox; emiller@JonesDay.com	Brian Easley		4/21/2014	RE: City of Detroit - Confidential Mediation Communication	Mediation	Document/email discussing a subject incident to mediation
PRIV_000466	Gadola, Michael	Muchrnore, Dennis (GOV); Posthumus, Dick (GOV); Baird, Richard (GOV); Tedder, Greg (GOV); Brader, Valerie (GOV)	Gadola, Michael			FW: City of Detroit - Confidential Mediation Communication	Mediation	Document/email discussing a subject incident to mediation
PRIV_000467	Gadola, Michael	Wurfel, Sara (GOV); Snyder, Rick (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV); Agen, Jarrod (GOV)	Gadola, Michael	Scott, Allison (GOV)		RE: Detroit - Second Amended Plan of Adjustment and Second Amended Disclosure Statement (As-Filed)	Mediation	Document/email discussing a subject incident to mediation
PRIV_000468	Gadola, Michael	Snyder, Rick (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Wurfel, Sara (GOV); Agen, Jarrod (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV)	Gadola, Michael	Scott, Allison (GOV)		FW: Update	Attorney Client Communication; Common Interest Agreement	Document/email containing communication with attorney
PRIV_000469	Gadola, Michael	Steven G. Howell ; Brader, Valerie (GOV) ; Kester K. So ; Schneider, Matthew (AG) ; Flancher, Steven (AG) ; Peter H. Ellsworth ; Dawn R. Copley ; Allison R. Bach	Gadola, Michael			RE: State Contribution Agreement	Attorney Client Communication	Document/email containing communication with attorney
PRIV_000470	Gadola, Michael	Gadola, Michael (GOV)	Monticello, Frank (AG)	Nelson, Margaret (AG); Murphy, Michael (AG); Brya, Michelle (AG)	5/30/2012	FW: Some back up for the debts described in para 13	Attomey Work Product	Document/email containing communication with attorney
PRIV_000471	Gadola, Michael	emiller@jonesday.com'; Flood, Ann (DIFS) ; Clinton, Kevin (TREASURY)	Brader, Valerie (GOV)	Tedder, Greg (GOV); Muchmore, Dennis (GOV); Gadola, Michael (GOV); Simons, Samantha (GOV)	11/14/2013	DO NOT FORWARD – Mediation re pensions	Mediation	Document/email discussing a subject incident to mediation
PRIV_000472	Gadola, Michael	Gadola, Michael (GOV)	Steven G. Howell	Schneider, Matthew (AG) ; Peter H. Ellsworth ; Kester K. So	12/1/2013	Next steps - Privileged and Confidential/Subject to Attorney-Client and Work Product Privilege	Attorney Client Communication	Document/email containing communication with attorney

rivileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000473	Gadola, Michael				12/16/2013	Update on available cash and possible revisions to proposal fir PFRS and GRS	Mediation	Document/email discussing a subject incident to mediation
PRIV_000474	Gadola, Michael	Flancher, Steven (AG); Saxton, Thomas (Treasury); Brader, Valerie (GOV); Jasen, Molly (AG); Moss, Shenique (AG); Headen, Frederick (Treasury)	Kester K. So	Gadola, Michael (GOV) ; Schneider, Matthew (AG)	12/19/2013	RE: ELB Order, 12-19-13	Attorney Client Communication	Document/email containing communication with attorney
PRIV_000475	Gadola, Michael	Brader, Valerie (GOV) ; Gadola, Michael (GOV)	Flancher, Steven (AG)	Schneider, Matthew (AG)	1/10/2014	Grant Information/Attorney Client Privilege	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000476	Gadola, Michael	Brader, Valerie (GOV)	Tedder, Greg (GOV)	Gadola, Michael (GOV); Clinton, Kevin (TREASURY)	1/10/2014	RE: Conditions list	Mediation	Document/email discussing a subject incident to mediation
PRIV_000477	Gadola, Michael				1/10/2014	Conditions of Settlement Agreement	Mediation	Document/email discussing a subject incident to mediation
PRIV_000478	Gadola, Michael	Gadola, Michael (GOV)	Brader, Valerie (GOV)	·	1/10/2014	RE: Two items	Attorney Client Communication	Document/email containing communication with attorney
PRIV_000479	Gadola, Michael	Brader, Valerie (GOV)	Saxton, Thomas (Treasury)	Gadola, Michael (GOV); KSo@dickinson-wright.com	1/17/2014	Detroit - Atty Client	Attorney Client Communication	Document/email containing communication with attorney
PRIV_000480	Gadola, Michael	Gerald_Rosen	Brader, Valerie (GOV)	Gadola, Michael (GOV); Snyder, Rick (GOV); Schneider, Matthew (AG); Scott, Allison (GOV)	1/20/2014	Detroit Mediation Settlement Terms	Mediation	Document/email discussing a subject incident to mediation
PRIV_000481	Gadola, Michael	Snyder, Rick (GOV)	Brader, Valerie (GOV)	Scott, Allison (GOV) ; Ellison, Melanie (GOV) ; Gadola, Michael (GOV) ; Tedder, Greg (GOV)	1/21/2014	Detroit mediation progress report	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000482	Gadola, Michael	Gadola, Michael (GOV); Brader, Valerie (GOV); Schneider, Matthew (AG); Flancher, Steven (AG)	Steven G. Howell	Kester K. So; Peter H. Ellsworth; Dawn R. Copley; Allison R. Bach	1/23/2014	FW: Detroit Mediation Proposal - Lazard Supporting Materials	Mediation	Document/email discussing a subject incident to mediation
PRIV_000483	Gadola, Michael	, ,			1/23/2014	Discussion materials on the City of Detroit Bankruptcy and pension plans	Mediation	Document/email discussing a subject incident to mediation
PRIV_000484	Gadola, Michael	Gadola, Michael (GOV) ; Lukasz Paszek ; Brader, Valerie (GOV)	Tedder, Greg (GOV)		1/24/2014	Fwd: [Detroit] Summary - Plan of Adjustment	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000485	Gadola, Michael				1/24/2014	Discussion materials on the City of Detroit Bankruptcy and pension plans	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000486	Gadola, Michael	Tedder, Greg (GOV); Gadola, Michael (GOV); lukasz@paszek.com	Brader, Valerie (GOV)		1/26/2014	FW: Detroit - Summary of Plan	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000487	Gadola, Michael	Gadola, Michael (GOV); Brader, Valerie (GOV); Schneider, Matthew (AG); Flancher, Steven (AG); Peter H. Ellsworth; Kester K. So; Dawn R. Copley; Allison R. Bach	Steven G. Howell		1/27/2014	FW: Detroit-Plan of Adjustment	Attomey Client Communication; Common Interest Agreement; Deliberative process; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000488	Gadola, Michael	Gadola, Michael (GOV) ; Saxton, Thomas (Treasury)	Brader, Valerie (GOV)		1/27/2014	Fwd: Potential Sources of Revenue (Settlement) CONFIDENTIAL/ ATTORNEY-CLIENT COMMUNICATION	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000489	Gadola, Michael	Brader, Valerie (GOV)	Steven G. Howell	Gadola, Michael (GOV); Schneider, Matthew (AG); Flancher, Steven (AG); Peter H. Ellsworth; Kester K. So; Dawn R. Copley; Allison R. Bach	1/27/2014	FW: DetroitPlan of Adjustment	Attomey Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000490	Gadola, Michael	Gadola, Michael (GOV); Brader, Valerie (GOV); Schneider, Matthew (AG); Flancher, Steven (AG); Peter H. Ellsworth; Kester K. So; Dawn R. Copley; Allison R. Bach	Steven G. Howell		1/27/2014	Plan Comments	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000491	Gadola, Michael	Bruce Bennett ; Thomas A Wilson; Heather Lennox	Steven G. Howell	Gadola, Michael (GOV); Brader, Valerie (GOV); Schneider, Matthew (AG); Flancher, Steven (AG); Kester K. So; Peter H. Ellsworth; Dawn R. Copley; Allison R. Bach	1/28/2014	State's Comments to Draft Plan of Adjustment/Privileged and Confidential per Mediation Order and Common Interest Agreement	Attomey Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000492	Gadola, Michael	Steven G. Howell	Bruce Bennett	Allison R. Bach; Brader, Valerie (GOV); Dawn R. Copley; Flancher, Steven (AG); Gadola, Michael (GOV); Heather Lennox; Kester K. So; Peter H. Ellsworth; Schneider, Matthew (AG); Thomas A Wilson	1/28/2014	*Confidential: Re: State's Comments to Draft Plan of Adjustment/Privileged and Confidential per Mediation Order and Common Interest Agreement	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000493	Gadola, Michael	SHowell@dickinson-wright.com; Gadola, Michael (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV)	Thomas A Wilson	Bruce Bennett ; Heather Lennox	1/29/2014	CONFIDENTIAL - Detroit - Draft Plan of Adjustment	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney, Document/email discussing a subject incident to mediation
PRIV_000494	Gadola, Michael	Schneider, Matthew (AG); Flancher, Steven (AG); Gadola, Michael (GOV); Brader, Valerie (GOV); Saxton, Thomas (Treasury)	Kester K. So	Steven G. Howell ; Peter H. Ellsworth	1/30/2014	Revised Draft of Michigan Settlement Administration Authority Act (CONFIDENTIAL)	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_000495	Gadola, Michael				1/30/2014	Proposed Draft Bill	Attorney Client Communication; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_000496	Gadola, Michael	Gadola, Michael (GOV)	Brock Swartzle		1/30/2014	RE: CONFIDENTIAL - Detroit - Draft Plan of Adjustment	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000497	Gadola, Michael	SHowell@dickinson-wright.com; Gadola, Michael (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV)	Thomas A Wilson	Bruce Bennett ; Heather Lennox	1/31/2014	CONFIDENTIAL - Detroit - Draft Financial/Restructuring Analyses	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_000498	Gadola, Michael	Snyder, Rick (GOV); Gadola, Michael (GOV); Lukasz Paszek; Tedder, Greg (GOV)	Brader, Valerie (GOV)		1/31/2014	Fwd: CONFIDENTIAL - Detroit - Draft Financial/Restructuring Analyses	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_000499	Gadola, Michael	Gadola, Michael (GOV) ; Brader, Valerie (GOV)	Brock Swartzle		1/31/2014	RE: Draft bill	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000500	Gadola, Michael	Gadola, Michael (GOV)	Brader, Valerie (GOV)		2/4/2014	Fwd: Michigan AFSCME on Governor Snyder's Proposal - City of Detroit	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000501	Gadola, Michael	Flancher, Steven (AG) ; Gadola, Michael (GOV) ; Schneider, Matthew (AG)	Brader, Valerie (GOV)	Steven G. Howell ; Peter H. Elisworth); Kester K. So; Jason, Molly (AG) ; Lambert, Alan (AG)	2/4/2014	RE: Mediation DWSD matters	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000502	Gadola, Michael	Dillon, Andy (Treasury); Stibitz, Brom (Treasury) >; Gaurav.Malhotra@ey.com; Kenneth Buckfire; Lennox Heather; james.doak@millerbuckfire.com; Daniel.Jemeycic@ey.com	Saxton, Thomas (Treasury)	Pleyte, Beth (Treasury)	6/5/2013	.FW: Detroit Debt Margin	Common interest Agreement	Document/email containing communication with attorney

Privileged Bates Begin	Custodian	Email To	Enail From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000503	Gadola, Michael				6/5/2013	Debt Margin Calculation	Common Interest Agreement	Document/email containing communication with attorney
PRIV_000504	Gadola, Michael	Snyder, Rick (GOV)	Brader, Valerie (GOV)	Posthumus, Dick (GOV); Gadola, Michael (GOV); Rustem, William (GOV); Tedder, Greg (GOV); Lukasz Paszek; Priest, Chris (GOV); Clinton, Kevin (TREASURY); Saxton, Thomas (Treasury)	2/5/2014	FW: Subject to Mediation Order CONFIDENTIAL	Attorney Client Communication; Mediation ,	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000505	Gadola, Michael	Brock Swartzle	. Gerald_Rosen	EDriker ; Gadola, Michael (GOV)	2/13/2014	Mediators' Response	Mediation	Document/email discussing a subject incident to mediation
PRIV_000506	Gadola, Michael	Gadola, Michael (GOV); Schneider, Matthew (AG); 'Steven G. Howell'; Tedder, Greg (GOV); lukasz@paszek.com	Brader, Valerie (GOV)		2/14/2014	FW: Detroit - Draft Plan/Disclosure Statement/Summary	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing attorney work product Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000507	Gadola, Michael				Feb-14	Plan for the Adjustment of the debts of the City of Detroit Draft	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000508	Gadola, Michael				2/14/2014	Plan for the Adjustment of the debts of the City of Detroit Draft	Attomey Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product, Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000509	Gadola, Michael				2/14/2014	Overview of Detroit Plan of Adjustment	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing attorney work product Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000510	Gadola, Michael	bbennett@jonesday.com; Heather Lennox	Steven G. Howell	Brader, Valerie (GOV) ; Gadola, Michael (GOV)	2/20/2014	Plan of Adjustment	Attomey Client Communication; Common Interest Agreement	Document/email containing communication with attorney
PRIV_000511	Gadola, Michael	Steven G. Howell	Heather Lennox	bbennett@jonesday.com; Brader, Valerie (GOV); Gadola, Michael (GOV); Thomas A Wilson	2/20/2014	Re: Plan of Adjustment	Attorney Client Communication; Common Interest Agreement	Document/email containing communication with attorney
PRIV_000512	Gadola, Michael				2/20/2014	Overview of Detroit Plan of Adjustment Draft	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000513	Gadola, Michael				2/20/2014	Overview of Detroit Plan of Adjustment Draft edits	Attomey Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product, Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000514	Gadola, Michael	Gadola, Michael (GOV)	Steven G. Howell		2/21/2014	FW: CLI_2187758_1_Change-Pro Redline - CLI- 2187655-v1 and CLI-2187655-v2.DOCX	Attomey Client Communication; Common Interest Agreement; Attomey Work Product; Mediation	Document/email containing attorney work product Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000515	Gadola, Michael				2/21/2014	Overview of Detroit Plan of Adjustment Draft edits	Attomey Client Communication; Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product, Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000516	Gadola, Michael	Schneider, Matthew (AG); 'Steven G. Howell'; Gadola, Michael (GOV); Flancher, Steven (AG)	Brader, Valerie (GOV)		2/21/2014	FW: Detroit - Plan of Adjustment and Disclosure Statement (As-Filed)	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Deliberative process; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000517	Gadola, Michael	Gadola, Michael (GOV) ; 'Steven G. Howell'	Brader, Valerie (GOV)		2/21/2014	RE: Plan of Adjustment & Pensioners	Attomey Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation

Privileged Bates Begin	Custodian	Emall To	Email From	Email GC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000518	Gadola, Michael	Snyder, Rick (GOV)	Brader, Valerie (GOV)	Scott, Allison (GOV) ; lukasz@paszek.com; Priest, Chris (GOV) ; Gadola, Michael (GOV)	2/21/2014	LowIncomeModel: Confidential - Subject to mediation order	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000519	Gadola, Michael	Gadola, Michael (GOV); Brader, Valerie (GOV); Schneider, Matthew (AG); Travis Weber; Brian Mills; Scott Starr	Brock Swartzle		2/24/2014	FW: Mediation Confidential — memo regarding enjoining non-consenting retirees from suing the State	Mediation	Document/email discussing a subject incident to mediation
PRIV_000520	Gadola, Michael				2/27/2014	Conditions to the DIA's the city's, the state's and founders commitments and initial payments under the settlement	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000521	Gadola, Michael	Gadola, Michael (GOV); Brader, Valerie (GOV); Schneider, Matthew (AG); Kester K. So	Steven G. Howell		2/27/2014	FW: Detroit Financing Transaction Documents	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney
PRIV_000522	Gadola, Michael					Upon further review, this document should not have been included with privilege log. It is nonresponsive	Attorney Client Communication; Common Interest Agreement	Document/email containing communication with attorney
PRIV_000523	Gadola, Michael					Upon further review, this document should not have been included with privilege log. It is nonresponsive	Attorney Client Communication; Common Interest Agreement	Document/email containing communication with attorney
PRIV_000524	Gadola, Michael	Saxton, Thomas (Treasury) ; Kester K. So	Brader, Valerie (GOV)	Gadola, Michael (GOV) ; Schneider, Matthew (AG) ; 'Steven G. Howell'	2/28/2014	FW: Detroit Financing Transaction Documents	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000525	Gadola, Michael	Brader, Valerie (GOV); Gadola, Michael (GOV); SHowell@dickinson-wright.com	Brian L. Sedlak strianlsedlak@jonesday.com>	Heather Lennox	2/28/2014	DIA Term Sheet	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000526	Gadola, Michael	Gadola, Michael (GOV); 'Steven G. Howell'; Schneider, Matthew (AG)	Brader, Valerie (GOV)	Kester K. So; Peter H. Ellsworth; Dawn R. Copley; Allison R. Bach	3/11/2014	RE: Conditions and Income Stabilization Payment	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000527	Gadola, Michael	Schneider, Matthew (AG); Gadola, Michael (GOV); Steven G. Howell; Clinton, Kevin (TREASURY)	Brader, Valerie (GOV)	Lukasz Paszek ; Chris DeRose (CDeRose@mersofmich.com); Stoddard, Phil (DTMB)	3/11/2014	CONFIDENTIAL AND SUBJECT TO MEDIATION ORDER – Discount Rate Backgrounder	Mediation	Document/email discussing a subject incident to mediation
PRIV_000528	Gadola, Michael	Heather Lennox	Gadola, Michael (GOV)	Brader, Valerie (GOV) ; Steven G. Howell ; Schneider, Matthew (AG)	3/14/2014	Conditions	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000529	Gadola, Michael	Gadola, Michael (GOV)	Gerald_Rosen		3/17/2014	Fw: Revised Term Sheet	Mediation	Document/email discussing a subject incident to mediation
PRIV_000530	Gadola, Michael	·			3/17/2014	Confidential Term Sheet for Mediators' Proposal	Mediation	Document/email discussing a subject incident to mediation
PRIV_000531	Gadola, Michael				3/17/2014	Confidential Term Sheet for Mediators' Proposal	Mediation	Document/email discussing a subject incident to mediation
PRIV_000532	Gadola, Michael	Gadola, Michael (GOV)	Gerald_Rosen		3/17/2014	Fw: Term Sheet	Mediation	Document/email discussing a subject incident to mediation
PRIV_000533	Gadola, Michael	Heather Lennox'; Gadola, Michael (GOV)	Brader, Valerie (GOV)	David G. Heiman ; Evan Miller ; Schneider, Matthew (AG) ; Steven G. Howell	3/18/2014	RE: Conditions	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000534	Gadola, Michael	Gadola, Michael (GOV)	Brader, Valerie (GOV)		3/20/2014	FW: Plain Language Insert	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_000535	Gadola, Michael	Eugene Driker ; Gerald Rosen	Brader, Valerie (GOV)	Gadola, Michael (GOV)	3/21/2014	Fwd: LowIncomeModel: Confidential - Subject to mediation order	Mediation	Document/email discussing a subject incident to mediation

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PRIV_000536	Gadola, Michael	Gadola, Michael (GOV); Schneider, Matthew (AG); Flancher, Steven (AG)	Brader, Valerie (GOV)		3/23/2014	FW: CONFIDENTIAL: Draft Solicitation Documents	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000537	Gadola, Michael				3/24/2014	Notice regarding proposed new pension and new post-employment healthcare benefits	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000538	Gadola, Michael	Gadola, Michael (GOV) ; Saxton, Thomas (Treasury) ; Tedder, Greg (GOV)	Brader, Valerie (GOV)		3/25/2014	CONFIDENTIAL AND SUBJECT TO MEDIATION ORDER	Mediation	Document/email discussing a subject incident to mediation
PRIV_000539	Gadola, Michael				3/26/2014	State's Proposal for Structure of Release	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_000540	Gadola, Michael	Gadola, Michael (GOV)	Brader, Valerie (GOV)		3/31/2014	Fwd: Amended Plan - with non-consensual and consensual releases (v13 against v12)	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000541	Gadola, Michael	'Brian L. Sedlak' <bri><bri> dianlsedlak@jonesday.com></bri></bri>	Brader, Valerie (GOV)	Heather Lennox	4/2/2014	RE: Revised Purchase Agreement Documents	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000542	Gadola, Michael	Gadola, Michael (GOV)	Brader, Valerie (GOV)		4/15/2014	FW: CONFIDENTIAL	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product, Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000543	Gadola, Michael	Gadola, Michael (GOV)	Heather Lennox		4/16/2014	Fw: Update	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000544	Gadola, Michael	Harkins, Chris (DTMB)	Travis Weber	Gadola, Michael (GOV); Brock Swartzle; Brian Mills; Scott Starr	4/16/2014	Settlement Appropriations	Mediation	Document/email discussing a subject incident to mediation
PRIV_000545	Gadola, Michael				4/17/2014	Proposed Draft Legislation	Mediation	Document/email discussing a subject incident to mediation
PRIV_000546	Gadola, Michael				4/17/2014	Proposed Draft Legislation	Mediation	Document/email discussing a subject incident to mediation
PRIV_000547	Gadola, Michael				4/17/2014	Proposed Draft Legislation	Mediation	Document/email discussing a subject incident to mediation
PRIV_000548	Gadola, Michael	'Robert D. Gordon (rgordon@clarkhill.com)'	Brader, Valerie (GOV)	Gadola, Michael (GOV) ; "Steven G. Howell" ; Heather Lennox	4/17/2014	GovernanceTermSheetGRS – CONFIDENTIAL AND SUBJECT TO MEDIATION ORDER	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000549	Gadola, Michael	Gadola, Michael (GOV)	Heather Lennox	Evan Miller ; David Heiman ; Bruce Bennett	4/21/2014	Fw: Fwd: Detroit	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000550	Gadola, Michael				4/21/2014	Redline Draft of the chamber proposal	Mediation	Document/email discussing a subject incident to mediation
PRIV_000551	Gadola, Michael					Voting Plan Language	Mediation	Document/email discussing a subject incident to mediation
PRIV_000552	Gadola, Michael	Brian Easley ; slevine@lowenstein.com	Steve Kreisberg <skreisberg@afscme.org></skreisberg@afscme.org>	Gerald_Rosen; Kevyn Orr ; foxs@detroitmi.gov; Gadola, Michael (GOV) ; David G. Heiman ; Heather Lennox ; Evan Miller ; Willis Goldsmith <wgoldsmith@jonesday.com></wgoldsmith@jonesday.com>	4/21/2014	RE: City of Detroit - Confidential Mediation Communication	Mediation	Document/email discussing a subject incident to mediation

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PRIV_000553	Gadola, Michael				4/20/2014	Draft letter of agreement re Contractual Work to Albert Garrett from K. Orr v 3	Mediation	Document/email discussing a subject incident to mediation
PRIV_000554	Gadola, Michael				4/20/2014	Attachment/Draft letter of agreement re Contractual Work to Albert Garrett from K. Orr v3	Mediation	Document/email discussing a subject incident to mediation
PRIV_000555	Gadola, Michael				4/21/2014	Wages (Addendum)	Mediation	Document/email discussing a subject incident to mediation
PRIV_000556	Gadola, Michael	Snyder, Rick (GOV) ; Tedder, Greg (GOV) ; Gadola, Michael (GOV)	Brader, Valerie (GOV)		12/17/2013	Fwd: DIA Statewide Proposal	Mediation	Document/email discussing a subject incident to mediation
PRIV_000557	Gadola, Michael	Gadola, Michael (GOV); Roberts, John (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV); Posthumus, Dick (GOV)	Muchmore, Dennis (GOV)		12/27/2013	RE: Mediation—Confidential attorney-client communication and subject to non-disclosure under federal court mediation order/rules	Attomey Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000558	Gadola, Michael	Gadola, Michael (GOV)	Muchmore, Dennis (GOV)		12/27/2013	RE: MediationConfidential attorney-client communication and subject to non-disclosure under federal court mediation order/rules	Attomey Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000559	Gadola, Michael	Brader, Valerie (GOV) ; Gadola, Michael (GOV)	Saxton, Thomas (Treasury)	Clinton, Kevin (TREASURY)	1/15/2014	Fwd: Potential Sources of Revenue (Settlement) CONFIDENTIAL/ ATTORNEY-CLIENT COMMUNICATION	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000560	Gadola, Michael	Schneider, Matthew (AG); Gadola, Michael (GOV); Saxton, Thomas (Treasury); Brader, Valerie (GOV); Steven G. Howell; Peter H. Ellsworth	Kester K. So		1/18/2014	Detroit - Atty Client/Confidential	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000561	Gadola, Michael	Gadola, Michael (GOV); Brader, Valerie (GOV); Schneider, Matthew (AG)	Brock Swartzle	Jennifer Dettloff	1/20/2014	bankruptcy	Mediation	Document/email discussing a subject incident to mediation
PRIV_000562	Gadola, Michael	Gadola, Michael (GOV)	Brader, Valerie (GOV)	•	1/20/2014	Cover to Rosen	Mediation	Document/email discussing a subject incident to mediation
PRIV_000563	Gadola, Michael	Brock Swartzle	Schneider, Matthew (AG)	Gadola, Michael (GOV) ; Brader, Valerie (GOV) ; Jennifer Dettloff	1/20/2014	Re: bankruptcy	Mediation	Document/email discussing a subject incident to mediation
PRIV_000564	Gadola, Michael	Gadola, Michael (GOV)	Steven G. Howell	Brader, Valerie (GOV); Schneider, Matthew (AG); Flancher, Steven (AG); Dawn R. Copley; Allison R. Bach; Kester K. So; Peter H. Ellsworth	1/20/2014	RE: Releasing Parties	Attorney Client Communication; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_000565	Gadola, Michael					Draft Release Language v 1	Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_000566	Gadola, Michael	Schneider, Matthew (AG)	Brock Swartzle	Gadola, Michael (GOV) ; Brader, Valerie (GOV) ; Jennifer Dettloff	1/20/2014	Re: bankruptcy	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000567	Gadola, Michael	Gerald_Rosen	Brader, Valerie (GOV)	Gadola, Michael (GOV); Schneider, Matthew (AG); Scott, Allison (GOV); Snyder, Rick (GOV)	1/20/2014	RE: Detroit Mediation Settlement Terms	Mediation	Document/email discussing a subject incident to mediation
PRIV_000568	Gadola, Michael	Gadola, Michael (GOV)	Snyder, Rick (GOV)	Brader, Valerie (GOV)	1/20/2014	Re: Detroit Mediation Settlement Terms	Mediation	Document/email discussing a subject incident to mediation
PRIV_000569	Gadola, Michael	Gerald Rosen	Brader, Valerie (GOV)	Gadola, Michael (GOV); Snyder, Rick (GOV); Scott, Allison (GOV)	1/21/2014	Mediation and public discussion of possible offer	Mediation .	Document/email discussing a subject incident to mediation
PRIV_000570	Gadola, Michael	Brock Swartzle ; Jennifer Dettloff	Schneider, Matthew (AG)	Brader, Valerie (GOV) ; Gadola, Michael (GOV)	1/21/2014	Re: bankruptcy	Mediation	Document/email discussing a subject incident to mediation
PRIV_000571	Gadola, Michael	Gadola, Michael (GOV) ; Scott, Allison (GOV)	Brader, Valerie (GOV)	Steven G. Howell ; Schneider, Matthew (AG)	1/21/2014	Fwd: Mediation and public discussion of possible offer	Mediation	Document/email discussing a subject incident to mediation
PRIV_000572	Gadola, Michael	Schneider, Matthew (AG)	Brader, Valerie (GOV)	Brock Swartzle ; Jennifer Dettloff; Gadola, Michael (GOV)	1/21/2014	Re: bankruptcy	Mediation	Document/email discussing a subject incident to mediation

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		Brader, Valerie (GOV) ;				The state of the s		Document/email discussing a subject incident to
PRIV_000573	Gadola, Michael	Schneider, Matthew (AG)	Brock Swartzle	Jennifer Dettloff; Gadola, Michael (GOV)	1/21/2014	RE: bankruptcy	Mediation	mediation
PRIV_000574	Gadola, Michael	Brock Swartzle	Jennifer Dettloff	Brader, Valerie (GOV); Schneider, Matthew (AG); Gadola, Michael (GOV)	1/21/2014	Re: bankruptcy	Mediation	Document/email discussing a subject incident to mediation
PRIV_000575	Gadola, Michael	Schneider, Matthew (AG)	Brock Swartzle	Gadola, Michael (GOV); Brader, Valerie (GOV); Jennifer Dettloff	1/21/2014	Re: bankruptcy	Mediation	Document/email discussing a subject incident to mediation
PRIV_000576	Gadola, Michael	Brock Swartzle'; Schneider, Matthew (AG)	Brader, Valerie (GOV)	Gadola, Michael (GOV) ; Jennifer Dettloff	1/22/2014	RE: bankruptcy	Mediation	Document/email discussing a subject incident to mediation
PRIV_000577	Gadola, Michael	Jennifer Dettloff'; 'Brock Swartzle'; Schneider, Matthew (AG)	Brader, Valerie (GOV)	Gadola, Michael (GOV)	1/22/2014	RE: bankruptcy	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000578	Gadola, Michael	Brader, Valerie (GOV)	Jennifer Dettloff	Gadola, Michael (GOV) ; Schneider, Matthew (AG)	1/22/2014	Questions from the SML	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000579	Gadola, Michael	Gadola, Michael (GOV) ; Brader, Valerie (GOV) ; Jennifer Dettloff	Schneider, Matthew (AG)		1/22/2014	Re: Questions from the SML	Attomey Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000580	Gadola, Michael	Snyder, Rick (GOV) ; Scott, Allison (GOV)	Tedder, Greg (GOV)	Brader, Valerie (GOV) ; Gadola, Michael (GOV)	1/23/2014	RE: Mediators Statement of appreciation for Legislative Leaders support	Mediation	Document/email discussing a subject incident to mediation
PRIV_000581	Gadola, Michael				1/24/2011	Draft 2 Senate/House Bill	Common Interest Agreement; Mediation	Document/email containing attorney work product Document/email discussing a subject incident to mediation
PRIV_000582	Gadola, Michael	Gadoia, Michael (GOV); Brader, Valerie (GOV); Schneider, Matthew (AG); Flancher, Steven (AG); Peter H. Ellsworth; Kester K. So; Dawn R. Copley; Allison R. Bach	Steven G. Howell		1/28/2014	FW: Detroit-Plan of Adjustment	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000583	Gadola, Mi chael	Brader, Valerie (GOV) ; Flancher, Steven (AG) ; Gadola, Michael (GOV) ; Schneider, Matthew (AG)	Steven G. Howell	Allison R. Bach ; Dawn R. Copley ; Kester K. So ; Peter H. Ellsworth	1/28/2014	RE: *Confidential: Re: State's Comments to Draft Plan of Adjustment/Privileged and Confidential per Mediation Order and Common Interest Agreement	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000584	Gadola, Michael	Gadola, Michael (GOV)	Steven G. Howell	Brader, Valerie (GOV); Flancher, Steven (AG); Schneider, Matthew (AG); Allison R. Bach; Dawn R. Copley; Kester K. So; Peter H. Ellsworth	1/28/2014	Re: *Confidential: Re: State's Comments to Draft Plan of Adjustment/Privileged and Confidential per Mediation Order and Common Interest Agreement	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000585	Gadola, Michael	Gadola, Michael (GOV)	Brader, Valerie (GOV)		1/28/2014	Fwd: Kellogg Foundation support	Mediation	Document/email discussing a subject incident to mediation
PRIV_000586	Gadola, Michael	Durfee, Sally (GOV); Ackerman, Darin (GOV); Posthumus, Dick (GOV)	Brader, Valerie (GOV)	Saxton, Thomas (Treasury) ; Gadola, Michael (GOV) ; Tedder, Greg (GOV)	2/4/2014	FW: County IIT and Sales Tax Data	Mediation	Document/email discussing a subject incident to mediation
PRIV_000587	Gadola, Michael	Gadola, Michael (GOV)	Brock Swartzle	Brader, Valene (GOV); Brian Mills; Travis Weber; Scott Starr	2/5/2014	Re: Bankruptcy	Mediation	Document/email discussing a subject incident to mediation
PRIV_000588	Gadola, Michael	Gerald_Rosen	Brock Swartzle	Gadola, Michael (GOV)	2/6/2014	Re: Bankruptcy Settlement	Mediation	Document/email discussing a subject incident to mediation
PRIV_000589	Gadola, Michael	Gadola, Michael (GOV)	Gerald_Rosen	EDriker	2/6/2014	Re: Bankruptcy Settlement	Mediation	Document/email discussing a subject incident to mediation
PRIV_000590	Gadola, Michael	Brock Swartzle	Gerald_Rosen	Gadola, Michael (GOV)	2/6/2014	Re: Bankruptcy Settlement	Mediation	Document/email discussing a subject incident to mediation
PRIV_000591	Gadola, Michael	Brock Swartzle	Gerald_Rosen	Gadola, Michael (GOV)	2/7/2014	Re: Bankruptcy Settlement	Mediation	Document/email discussing a subject incident to mediation
PRIV_000592	Gadola, Michael	Gerald_Rosen	Brock Swartzle	Gadola, Michael (GOV)	2/7/2014	Re: Bankruptcy Settlement	Mediation	Document/email discussing a subject incident to mediation

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000593	Gadola, Michael	Gerald_Rosen	Brock Swartzle	Gadola, Michael (GOV)	2/12/2014	FW: Mediators Response	Mediation	Document/email discussing a subject incident to mediation
PRIV_000594	Gadola, Michael				2/20/2014	Memo To Mediators from State Representative re Response to House Conditions	Mediation	Document/email discussing a subject incident to mediation
PRIV_000595	Gadola, Michael	Lukasz Paszek ; Priest, Chris (GOV)	Brader, Valerie (GOV)	Gadola, Michael (GOV)	2/14/2014	RE: Settlement language (preliminary) // Confidential - Subject to mediation	Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_000596	Gadola, Michael	Gadola, Michael (GOV); 'Steven G. Howell'; Schneider, Matthew (AG); Flancher, Steven (AG)	Brader, Valerie (GOV)		2/16/2014	Language re poverty prevention payments	Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_000597	Gadola, Michael	Gadola, Michael (GOV)	Brader, Valerie (GOV)	Lukasz Paszek ; Priest, Chris (GOV) ; Steven G. Howell ; Schneider, Matthew (AG) ; Tedder, Greg (GOV)	2/20/2014	Fwd: Detroit - Draft Plan/Disclosure Statement/Summary	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_000598	Gadola, Michael				2/20/2014	Draft Plan of Adjustment v 25	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_000599	Gadola, Michael				2/20/2014	Draft Plan of Adjustment v 25	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_000600	Gadola, Michael				2/20/2014	Draft Plan of Adjustment v 18	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_000601	Gadola, Michael				2/20/2014	Draft Plan of Adjustment v 3	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_000602	Gadola, Michael				2/20/2014	Draft Plan of Adjustment v3	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_000603	Gadola, Michael	Gadola, Michael (GOV)	Steven G. Howell		2/20/2014	Re: POA Message Docs	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000604	Gadola, Michael	Heather Lennox	Heather Lennox	bbennett@jonesday.com; Brader, Valerie (GOV); Gadola, Michael (GOV); Steven G. Howell; Thomas A Wilson	2/20/2014	Re: Plan of Adjustment	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000605	Gadola, Michael				2/20/2014	Draft Plan of Adjustment v 4	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000606	Gadola, Michael	Gadola, Michael (GOV); Brader, Valerie (GOV)	Steven G. Howell		2/21/2014	FW: Plan of Adjustment & Pensioners	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000607	Gadola, Michael	Heather Lennox	Brader, Valerie (GOV)	Gadola, Michael (GOV)	2/21/2014	KEY ERROR IN PLAN	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000608	Gadola, Michael	Brader, Valerie (GOV)	Heather Lennox	Gadola, Michael (GOV)	2/21/2014	Re: KEY ERROR IN PLAN	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000609	Gadola, Michael	Gadola, Michael (GOV)	Steven G. Howell	Brader, Valene (GOV)	2/22/2014	Re: Plan of Adjustment & Pensioners	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000610	Gadola, Michael	Heather Lennox	Steven G. Howell	Evan Miller ; Gadola, Michael (GOV) ; Brader, Valerie (GOV) ; Schneider, Matthew (AG)	2/23/2014	Re: Plan of Adjustment & Pensioners	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000611	Gadola, Michael	Brader, Valerie (GOV) ; Gadola, Michael (GOV) ; Schneider, Matthew (AG)	Brock Swartzle	Brian Mills ; Travis Weber ; Scott Starr	2/26/2014	FW: Mediation Confidential – memo regarding enjoining non-consenting retirees from suing the State	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000612	Gadola, Michael	Brock Swartzle	Schneider, Matthew (AG)	Brader, Valerie (GOV); Gadola, Michael (GOV); Brian Mills; Travis Weber; Scott Starr	2/26/2014	Re: Mediation Confidential – memo regarding enjoining non-consenting retirees from suing the State	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000613	Gadola, Michael	Gadola, Michael (GOV)	Schneider, Matthew (AG)	Brader, Valerie (GOV) ; Steven G. Howell	2/28/2014	Re: Conditions	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000614	Gadola, Michael					Conditions to Contribution by SOM	Attomey Client Communication; Common Interest Agreement; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_000615	Gadola, Michael					Conditions to Contribution by SOM	Attorney Client Communication; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_000616	Gadola, Michael					Exhibit 1 to Conditions to Contributions by SOM	Attorney Client Communication; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_000617	Gadola, Michael					Exhibit 1 to Conditions to Contributions by SOM	Attorney Client Communication; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_000618	Gadola, Michael					Proposed Structure for Income Stabilization	Attorney Client Communication; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_000619	Gadola, Michael					Proposed Structure for Income Stabilization	Attorney Client Communication; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_000620	Gadola, Michael	Brian L. Sedlak shrianlsedlak@jonesday.com>; kevin.haggard@millerbuckfire.co m; Van Dusen, Amanda (VanDusen@MillerCanfield.com); Buckfire, Kenneth (Miller Buckfire) <ken.buckfire@millerbuckfire.com </ken.buckfire@millerbuckfire.com ; Heather Lennox; stacy Fox	Brader, Valerie (GOV)	Gadola, Michael (GOV) ; Steven G. Howell	3/18/2014	Brader comments 2014 03 14 DWSD - Draft RFI v2.docx	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000621	Gadola, Michael					Draft RFI DWSD	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000622	Gadola, Michael	Gadola, Michael (GOV)	Gerald_Rosen		3/19/2014	State conditions	Mediation	Document/email discussing a subject incident to mediation
PRIV_000623	Gadola, Michael	Gadola, Michael (GOV)	Gerald_Rosen		3/20/2014	Re: State conditions	Mediation	Document/email discussing a subject incident to mediation
PRIV_000624	Gadola, Michael	Gadola, Michael (GOV)	Brader, Valerie (GOV)		3/25/2014	FW: Negotiations with Don Taylor	Mediation	Document/email discussing a subject incident to mediation
PRIV_000625	Gadola, Michael	EDriker'	Brader, Valerie (GOV)	Gadola, Michael (GOV)	3/25/2014	RE: Negotiations with Don Taylor	Mediation	Document/email discussing a subject incident to mediation

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000626	Gadola, Michael	Gadola, Michael (GOV)	Brader, Valerie (GOV)	Steven G. Howell	3/27/2014	Re: Retiree Committee	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000627	Gadola, Michael	Gadola, Michael (GOV)	Steven G. Howell		3/27/2014	RE: Release	Attorney Client Communication; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_000628	Gadola, Michael	Gadola, Michael (GOV)	Brader, Valerie (GOV)		3/31/2014	Fwd: Amended Plan - with non-consensual and consensual releases (v13 against v12)	Common Interest Agreement; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_000629	Gadola, Michael	Steven G. Howell	Brader, Valerie (GOV)	Gadola, Michael (GOV) ; West, Samantha (GOV)	4/7/2014	Re: Issue re Pensions	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000630	Gadola, Michael	Kevyn Orr; Allison R. Bach; Dawn R. Copley; 'Steven G. Howell'; Mary M Reil; Sarah Griffin; Gadola, Michael (GOV); Priest, Chris (GOV); lukasz@paszek.com	Brader, Valerie (GOV)	Evan Miller ; Heather Lennox ; Kenneth J. Sachs ; Amanda Van Dusen	4/11/2014	RE: Revised IS terms	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000631	Gadola, Michael	Sarah Griffin ; Kevyn Orr ; Allison R. Bach ; Dawn R. Copley ; 'Steven G. Howell' ; Mary Reil ; Gadola, Michael (GOV) ; Priest, Chris (GOV) ; lukasz@paszek.com	Brader, Valerie (GOV)	Evan Miller ; Heather Lennox ; Kenneth Sachs ; Amanda Van Dusen	4/11/2014	RE: Revised IS terms	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000632	Gadola, Michael	Gadola, Michael (GOV)	Brader, Valerie (GOV)		4/11/2014	Re: Revised IS terms	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000633	Gadola, Michael	Gadola, Michael (GOV)	Brader, Valerie (GOV)		4/15/2014	FW: State Contribution Agreement	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000634	Gadola, Michael	Gadola, Michael (GOV)	Gerald_Rosen		4/16/2014	Re: Fwd: Latest draft statement for Judge Rosen review	Mediation	Document/email discussing a subject incident to mediation
PRIV_000635	Gadola, Michael	Gadola, Michael (GOV)	Brader, Valerie (GOV)	Baird, Richard (GOV) ; Posthumus, Dick (GOV)	4/16/2014	Re: Detroit - AFSCME Tentative Agreement (revised Privatization Language)	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000636	Gadola, Michael	Gadola, Michael (GOV)	Brader, Valerie (GOV)	Baird, Richard (GOV) ; Posthumus, Dick (GOV)	4/16/2014	Re: Detroit - AFSCME Tentative Agreement (revised Privatization Language)	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000637	Gadola, Michael				4/17/2014	Draft Term Sheet for GRS	Mediation	Document/email discussing a subject incident to mediation
PRIV_000638	Gadola, Michael				4/17/2014	Draft Term Sheet for GRS	Mediation	Document/email discussing a subject incident to mediation
PRIV_000639	Gadola, Michael	Gadola, Michael (GOV)	Kester K. So		4/17/2014	RE: Settlement Appropriations	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000640	Gadola, Michael	Gadola, Michael (GOV)	Steven G. Howell		4/18/2014	Re: Notice of mediation session – Subject to Mediation Confidentiality and Privilege	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000641	Gadola, Michael	Gadola, Michael (GOV)	Brian Easley	Kevyn Orr ; foxs@detroitmi.gov; David G. Heiman ; Heather Lennox ; Evan Miller	4/20/2014	RE: City of Detroit -Confidential Mediation Communication	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation

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PRIV_000642	Gadola, Michael	beasley@JonesDay.com	Kevyn Orr	Stacy Fox; dgheiman@JonesDay.com; emiller@JonesDay.com; hlennox@JonesDay.com; Gadola, Michael (GOV)	4/20/2014	Re: City of Detroit -Confidential Mediation Communication	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000643	Gadola, Michael	Gadola, Michael (GOV)	Gerald_Rosen		4/20/2014	Re: Fwd: City of Detroit -Confidential Mediation Communication	Mediation	Document/email discussing a subject incident to mediation
PRIV_000644	Gadola, Michael	Brian Easley	Gerald_Rosen	SKreisberg@afscme.org; slevine@lowenstein.com; Kevyn Orr; foxs@detroitmi.gov; Gadola, Michael (GOV); David G. Heiman; Heather Lennox; Evan Miller; Willis Goldsmith <wgoldsmith@jonesday.com></wgoldsmith@jonesday.com>	4/21/2014	Re: City of Detroit - Confidential Mediation Communication	Mediation	Document/email discussing a subject incident to mediation
PRIV_000645	Gadola, Michael	Gerald Rosen ; Brian Easley	Heather Lennox	Steve Kreisberg <skreisberg@afscme.org>; Sharon L. Levine <slevine@lowenstein.com>; Kevyn Orr ; Stacy Fox ; Gadola, Michael (GOV) ; David G. Heiman ; Evan Miller ; Willis Goldsmith <wgoldsmith@jonesday.com></wgoldsmith@jonesday.com></slevine@lowenstein.com></skreisberg@afscme.org>	4/21/2014	Re: City of Detroit - Confidential Mediation Communication	Mediation	Document/email discussing a subject incident to mediation
PRIV_000646	Gadola, Michael	Heather Lennox	Gerald_Rosen	Brian Easley; Steve Kreisberg <skreisberg@afscme.org>; Sharon L. Levine <slevine@lowenstein.com>; Kevyn Orr; Stacy Fox; Gadola, Michael (GOV); David G. Heiman; Evan Miller; Willis Goldsmith <wgoldsmith@jonesday.com></wgoldsmith@jonesday.com></slevine@lowenstein.com></skreisberg@afscme.org>	4/21/2014	Re: City of Detroit - Confidential Mediation Communication	Mediation	Document/email discussing a subject incident to mediation
PRIV_000647	Gadola, Michael	Levine, Sharon L. <slevine@lowenstein.com></slevine@lowenstein.com>	Gerald_Rosen	Heather Lennox; Brian Easley; Steve Kreisberg <skreisberg@afscme.org>; Kevyn Orr; Stacy Fox; Gadola, Michael (GOV); David G. Heiman; Evan Miller; Willis Goldsmith <wgoldsmith@jonesday.com></wgoldsmith@jonesday.com></skreisberg@afscme.org>	4/21/2014	Re: City of Detroit - Confidential Mediation Communication	Mediation	Document/email discussing a subject incident to mediation
PRIV_000648	Gadola, Michael	Tedder, Greg (GOV) ; Gadola, Michael (GOV) ; Posthumus, Dick (GOV)	Muchmore, Dennis (GOV)	Wisniewski, Wendy (GOV)	4/21/2014	RE: City of Detroit -Confidential Mediation Communication	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000649	Gadola, Michael	Kevyn Orr ; Brian Easley ; Gadola, Michael (GOV)	Stacy Fox		4/21/2014	Re: FW: *Confidential: Privileged and Confidential Attorney-Client Communication (AFSCME Letter of Agreement)	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000650	Gadola, Michael	hlennox@JonesDay.com; Gadola, Michael (GOV)	Stacy Fox	Kevyn Оп ; gaurav.malhotra@ey.com; juan.santambrogio@ey.com; dgheiman@JonesDay.com	4/21/2014	RE: Cuts	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000651	Gadola, Michael	Brader, Valerie (GOV)	Gadola, Michael (GOV)	Simons, Samantha (GOV)	11/18/2013	RE: DO NOT FORWARD – Mediation re pensions	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000652	Gadola, Michael	Steven G. Howell' ; Schneider, Matthew (AG)	Gadola, Michael (GOV)	Peter H. Ellsworth; Kester K. So; Brader, Valerie (GOV); Nelson, Margaret (AG); Flancher, Steven (AG); Lindstrom, Aaron (AG)	12/12/2013	RE: Next steps - Privileged and Confidential/Subject to Attorney-Client and Work Product Privilege	Attorney Client Communication; Attorney Work Product	Document/email containing communication with attorney
PRIV_000653	Gadola, Michael	Steven G. Howell' ; Schneider, Matthew (AG)	Gadola, Michael (GOV)	Peter H. Ellsworth; Kester K. So; Brader, Valerie (GOV); Nelson, Margaret (AG); Flancher, Steven (AG); Lindstrom, Aaron (AG)	12/12/2013	RE: Next steps - Privileged and Confidential/Subject to Attorney-Client and Work Product Privilege	Attorney Client Communication; Attorney Work Product	Document/email containing communication with attorney
PRIV_000654	Gadola, Michael	Brader, Valerie (GOV) ; Flancher, Steven (AG) ; Steven G. Howell	Gadola, Michael (GOV)	Schneider, Matthew (AG); Peter H. Ellsworth; Kester K. So Nelson, Margaret (AG); Lindstrom, Aaron (AG)	12/13/2013	RE: Next steps - Privileged and Confidential/Subject to Attorney-Client and Work Product Privilege	Attorney Client Communication; Attorney Work Product	Document/email containing communication with attorney
PRIV_000655	Gadola, Michael	Brader, Valerie (GOV)	Gadola, Michael (GOV)		12/13/2013	RE: Next steps - Privileged and Confidential/Subject to Attorney-Client and Work Product Privilege	Attorney Client Communication; Attorney Work Product	Document/email containing communication with attorney
PRIV_000656	Gadola, Michael	Brader, Valerie (GOV)	Gadola, Michael (GOV)		12/17/2013	RE: Fund to Support Detroit Retirees, Cultural Heritage and Revitalization	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000657	Gadola, Michael	Stacy Fox	Gadola, Michael (GOV)	Heather Lennox; 'emiller@JonesDay.com'; Tedder, Greg (GOV)	12/19/2013	SBs 541-545	Common Interest Agreement	Document/email containing communication with attorney
PRIV_000658	Gadola, Michael		:		12/12/2013	Enrolled Bill Analysis	Common Interest Agreement	Document/email containing communication with attorney

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PRIV_000659	Gadola, Michael	Brader, Valerie (GOV)	Gadola, Michael (GOV)		12/19/2013	RE: Andy Dillon	Attorney Client Communication; Attorney Work Product	Document/email containing communication with attorney
PRIV_000660	Gadola, Michael	Snyder, Rick (GOV); Muchmore, Dennis (GOV); Roberts, John (GOV); Posthumus, Dick (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV)	Gadola, Michael (GOV)	Scott, Allison (GOV)	12/26/2013	Mediation-Confidential attorney-client communication and subject to non-disclosure under federal court mediation order/rules	Attorney Client Communication; Attorney Work Product; Deliberative process; Mediation	Document/email containing attorney work product; Document/email containing communication with attorney; Document/email discussing a subject incident to mediation; Email containing pre- decisional deliberations
PRIV_000661	Gadola, Michael	Brader, Valene (GOV)	Gadola, Michael (GOV)	Snyder, Rick (GOV); Muchmore, Dennis (GOV); Roberts, John (GOV); Posthumus, Dick (GOV); Tedder, Greg (GOV); ; Scott, Allison (GOV)	12/27/2013	Re: MediationConfidential attorney-client communication and subject to non-disclosure under federal court mediation order/rules	Attorney Client Communication; Attorney Work Product; Deliberative process; Mediation	Document/email containing attorney work product; Document/email containing communication with attorney; Document/email discussing a subject incident to mediation; Email containing pre- decisional deliberations
PRIV_000662	Gadola, Michael	Muchmore, Dennis (GOV); Roberts, John (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV); Posthumus, Dick (GOV)	Gadola, Michael (GOV)		12/27/2013	Fwd: Mediation—Confidential attorney-client communication and subject to non-disclosure under federal court mediation order/rules	Attorney Client Communication; Attorney Work Product; Deliberative process; Mediation	Document/email containing attorney work product; Document/email containing communication with attorney; Document/email discussing a subject incident to mediation; Email containing pre- decisional deliberations
PRIV_000663	Gadola, Michael	Snyder, Rick (GOV)	Gadola, Michael (GOV)	Brader, Valerie (GOV); Muchmore, Dennis (GOV); Roberts, John (GOV); Posthumus, Dick (GOV); Tedder, Greg (GOV); Scott, Allison (GOV)	12/27/2013	Re: MediationConfidential attorney-client communication and subject to non-disclosure under federal court mediation order/rules	Attorney Client Communication; Attorney Work Product; Deliberative process; Mediation	Document/email containing attorney work product; Document/email containing communication with attorney; Document/email discussing a subject incident to mediation; Email containing pre- decisional deliberations
PRIV_000664	Gadola, Michael	Brader, Valerie (GOV)	Gadola, Michael (GOV)	Muchmore, Dennis (GOV); Roberts, John (GOV); Tedder, Greg (GOV); Posthumus, Dick (GOV)	12/27/2013	Re: MediationConfidential attorney-client communication and subject to non-disclosure under federal court mediation order/rules	Attorney Client Communication; Attorney Work Product; Deliberative process; Mediation	Document/email containing attorney work product Document/email containing communication with attorney; Document/email discussing a subject incident to mediation; Email containing pre- decisional deliberations
PRIV_000665	Gadola, Michael	Schneider, Matthew (AG)	Gadola, Michael (GOV)	Brader, Valerie (GOV)	1/2/2014	Re: Estimate cost of continuing Detroit litigation	Attorney Client Communication	Document/email containing communication with attorney
PRIV_000666	Gadola, Michael	Schneider, Matthew (AG)	Gadola, Michael (GOV)	·	1/2/2014	Re: Estimate cost of continuing Detroit litigation	Attorney Client Communication	Document/email containing communication with attorney
PRIV_000667	Gadola, Michael	Snyder, Rick (GOV) ; Brader, Valerie (GOV)	Gadola, Michael (GOV)		1/20/2014	Fwd: Detroit Mediation Settlement Terms	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000668	Gadola, Michael	Gerald_Rosen	Gadola, Michael (GOV)	Brader, Valerie (GOV)	1/20/2014	Re: Detroit Mediation Settlement Terms	Mediation	Document/email discussing a subject incident to mediation
PRIV_000669	Gadola, Michael	Snyder, Rick (GOV)	Gadola, Michael (GOV)	Brader, Valerie (GOV); Muchmore, Dennis (GOV); Roberts, John (GOV); Scott, Allison (GOV)	1/20/2014	Re: Detroit Mediation Settlement Terms; Notice: Confidential - mediation related	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000670	Gadola, Michael	Wurfel, Sara (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV); Agen, Jarrod (GOV); Roberts, John (GOV); Muchmore, Dennis (GOV); Posthumus, Dick (GOV); Durfee, Sally (GOV)	Gadola, Michael (GOV)	Scott, Allison (GOV); Wisniewski, Wendy (GOV)	1/22/2014	RE: HIGH PRIORITY Draft Detroit news release	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation

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Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject Subject	Privilege Type	Privilege Descriptions
PRIV_000671	Gadola, Mi chael	Tedder, Greg (GOV); Agen, Jarrod (GOV); Wurfel, Sara (GOV); Brader, Valerie (GOV); Roberts, John (GOV); Muchmore, Dennis (GOV); Posthumus, Dick (GOV); Durfee, Sally (GOV)	Gadola, Michael (GOV)	Scott, Allison (GOV); Wisniewski, Wendy (GOV)	1/22/2014	RE: HIGH PRIORITY Draft Detroit news release	Attomey Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000672	Gadola, Michael	Wurfel, Sara (GOV); Tedder, Greg (GOV); Agen, Jarrod (GOV); Brader, Valerie (GOV); Roberts, John (GOV); Muchmore, Dennis (GOV); Posthumus, Dick (GOV); Durfee, Sally (GOV); Ackerman, Darin (GOV)	Gadola, Michael (GOV)	Scott, Allison (GOV); Wisniewski, Wendy (GOV); Rospond, Laurie (GOV); Keilen, Alison (GOV)	1/22/2014	RE: HIGH PRIORITY Draft Detroit news release	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000673	Gadola, Michael	Muchmore, Dennis (GOV)	Gadola, Michael (GOV)		1/22/2014	RE: HIGH PRIORITY Draft Detroit news release	Attorney Client Communication; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_000674	Gadola, Michael	Brader, Valerie (GOV) ; Tedder, Greg (GOV) ; Lukasz Paszek	Gadola, Michael (GOV)		1/24/2014	RE: [Detroit] Summary - Plan of Adjustment	Attorney Client Communication; Common Interest Agreement	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000675	Gadola, Michael	Steven G. Howell'; Brader, Valerie (GOV); Schneider, Matthew (AG); Flancher, Steven (AG); Peter H. Ellsworth; Kester K. So; Dawn R. Copley; Allison R. Bach	Gadola, Michael (GOV)	West, Samantha (GOV) ; Tedder, Greg (GOV)	1/27/2014	RE: Detroit-Plan of Adjustment	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_000676	Gadola, Michael	Tedder, Greg (GOV)	Gadola, Michael (GOV)		1/27/2014	FW: DetroitPlan of Adjustment	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_000677	Gadola, Michael	Steven G. Howell' ; Brader, Valerie (GOV)	Gadola, Michael (GOV)	Schneider, Matthew (AG); Flancher, Steven (AG); Peter H. Ellsworth; Kester K. So; Dawn R. Copley; Allison R. Bach; West, Samantha (GOV)	1/27/2014	RE: DetroitPlan of Adjustment	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_000678	Gadola, Michael	Steven G. Howell'; Brader, Valerie (GOV); Schneider, Matthew (AG); Flancher, Steven (AG); Peter H. Ellsworth; Kester K. So; Dawn R. Copley; Allison R. Bach	Gadola, Michael (GOV)		1/28/2014	RE: Detroit-Plan of Adjustment	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000679	Gadola, Michael	Steven G. Howell'; Brader, Valene (GOV); Schneider, Matthew (AG); Flancher, Steven (AG); Peter H. Ellsworth; Kester K. So; Dawn R. Copley; Allison R. Bach	Gadola, Michael (GOV)		1/28/2014	RE: Plan Comments	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000680	Gadola, Michael	Steven G. Howell'; Brader, Valerie (GOV); Flancher, Steven (AG); Schneider, Matthew (AG)	Gadola, Michael (GOV)	Allison R. Bach ; Dawn R. Copley ; Kester K. So ; Peter H. Ellsworth	1/28/2014	RE: *Confidential: Re: State's Comments to Draft Plan of Adjustment/Privileged and Confidential per Mediation Order and Common Interest Agreement	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000681	Gadola, Michael	Brader, Valerie (GOV); 'Steven G. Howell'; Flancher, Steven (AG); Schneider, Matthew (AG)	Gadola, Michael (GOV)	Allison R. Bach ; Dawn R. Copley ; Kester K. So ; Peter H. Eilsworth	1/28/2014	RE: *Confidential: Re: State's Comments to Draft Plan of Adjustment/Privileged and Confidential per Mediation Order and Common Interest Agreement	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000682	Gadola, Michael	Snyder, Rick (GOV)	Gadola, Michael (GOV)	Brader, Valerie (GOV) ; Scott, Allison (GOV)	1/28/2014	FW: Potential Sources of Revenue (Settlement) CONFIDENTIAL/ ATTORNEY-CLIENT COMMUNICATION	Attorney Client Communication	Document/email containing communication with attorney
PRIV_000683	Gadola, Michael	Brader, Valerie (GOV)	Gadola, Michael (GOV)		1/28/2014	Re: Kellogg Foundation support	Mediation	Document/email discussing a subject incident to mediation
PRIV_000684	Gadola, Michael	Brock Swartzle	Gadola, Michael (GOV)		1/30/2014	FW: CONFIDENTIAL - Detroit - Draft Plan of Adjustment	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000685	Gadola, Michael	Brock Swartzle	Gadola, Michael (GOV)		1/30/2014	Draft bill	Mediation	Document/email discussing a subject incident to mediation
PRIV_000686	Gadola, Michael				1/30/2014	Draft of Proposed Legislation	Mediation	Document/email discussing a subject incident to mediation
PRIV_000687	Gadola, Michael					Upon further review, this document should not have been included with privilege log. It is nonresponsive	Mediation	Document/email discussing a subject incident to mediation
PRIV_000688	Gadola, Michael	Snyder, Rick (GOV)	Gadola, Michael (GOV)	Scott, Allison (GOV); Brader, Valerie (GOV); Muchmore, Dennis (GOV); Posthumus, Dick (GOV)	1/31/2014	Rosen-CONFIDENTIAL-SUBJECT TO BANKRUPTCY COURT MEDIATION ORDER	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000689	Gadola, Michael	Jennifer Dettloff	Gadola, Michael (GOV)		1/31/2014	FW: CONFIDENTIAL - Detroit - Draft Plan of Adjustment	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000690	Gadola, Michael	Snyder, Rick (GOV)	Gadola, Michael (GOV)	Muchmore, Dennis (GOV); Posthumus, Dick (GOV); Brader, Valerie (GOV); Scott, Allison (GOV); Tedder, Greg (GOV)	1/31/2014	FW: Draft bill-CONFIDENTIAL-SUBJECT TO BANKRUPTCY COURT MEDIATION ORDER	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000691	Gadola, Michael	Brader, Valerie (GOV)	Gadola, Michael (GOV)		2/4/2014	RE: Michigan AFSCME on Governor Snyder's Proposal - City of Detroit	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000692	Gadola, Michael	Gordon, Robert D.'; Steven G. Howell; Brader, Valerie (GOV)	Gadola, Michael (GOV)	Bradley A. Robins); Eric Mendelsohn ; Michael J. VanOverbeke ; Turner, Joseph E., Jr. ; King, Ronald A.	2/11/2014	RE: Detroit: Retirement Systems' POA issue analysis	Mediation	Document/email discussing a subject incident to mediation
PRIV_000693	Gadola, Michael	Brock Swartzle	Gadola, Michael (GOV)		2/12/2014	Re: Mediators Response	Mediation	Document/email discussing a subject incident to mediation
PRIV_000694	Gadola, Michael	Brock Swartzie'	Gadola, Michael (GOV)		2/13/2014	RE: Mediators' Response	Mediation	Document/email discussing a subject incident to mediation
PRIV_000695	Gadola, Michael	Brader, Valerie (GOV); Schneider, Matthew (AG); Muchmore, Dennis (GOV)	Gadola, Michael (GOV)		2/13/2014	RE: Detroit: Retirement Systems' POA issue analysis	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000696	Gadola, Michael	Snyder, Rick (GOV)	Gadola, Michael (GOV)	Muchmore, Dennis (GOV); Scott, Allison (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV)	2/18/2014	Update-Meeting with Judge Rosen	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000697	Gadola, Michael	Steven G. Howell	Gadola, Michael (GOV)		2/20/2014	FW: POA Message Docs	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000698	Gadola, Michael	Snyder, Rick (GOV) ; Agen, Jarrod (GOV)	Gadola, Michael (GOV)	Muchmore, Dennis (GOV); Wurfel, Sara (GOV); Tedder, Greg (GOV); Brader, Valerie (GOV); Baird, Richard (GOV); Scott, Allison (GOV); Roberts, John (GOV); Clement, Elizabeth (GOV); Wisniewski, Wendy (GOV)	2/20/2014	RE: POA Message Docs	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000699	Gadola, Michael	Baird, Richard (GOV)	Gadola, Michael (GOV)	Brader, Valerie (GOV); Snyder, Rick (GOV); Agen, Jarrod (GOV); Muchmore, Dennis (GOV); Wurfel, Sara (GOV); Tedder, Greg (GOV); Scott, Allison (GOV); Roberts, John (GOV); Clement, Elizabeth (GOV); Wisniewski, Wendy (GOV); Priest, Chris (GOV); lukasz@paszek.com	2/20/2014	Re: POA Message Docs	Attorney Client Communication; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_000700	Gadola, Michael	Brader, Valerie (GOV)	Gadola, Michael (GOV)	Snyder, Rick (GOV); Wurfel, Sara (GOV); Baird, Richard (GOV); Agen, Jarrod (GOV); Muchmore, Dennis (GOV); Tedder, Greg (GOV); Scott, Allison (GOV); Roberts, John (GOV); Clement, Elizabeth (GOV); Wisniewski, Wendy (GOV); Priest, Chris (GOV); lukasz@paszek.com	2/21/2014	Re: POA Message Docs	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000701	Gadola, Michael	Brader, Valerie (GOV)	Gadola, Michael (GOV)	Snyder, Rick (GOV); Wurfel, Sara (GOV); Baird, Richard (GOV); Agen, Jarrod (GOV); Muchmore, Dennis (GOV); Tedder, Greg (GOV); Scott, Allison (GOV); Roberts, John (GOV); Clement, Elizabeth (GOV); Wisniewski, Wendy (GOV); Priest, Chris (GOV); Jukasz@paszek.com	2/21/2014	Re: POA Message Docs	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000702	Gadola, Michael	Brader, Valerie (GOV)	Gadola, Michael (GOV)	Snyder, Rick (GOV); Wurfel, Sara (GOV); Baird, Richard (GOV); Agen, Jarrod (GOV); Muchmore, Dennis (GOV); Tedder, Greg (GOV); Scott, Allison (GOV); Roberts, John (GOV); Clement, Elizabeth (GOV); Wisniewski, Wendy (GOV); Priest, Chris (GOV); lukasz@paszek.com	2/21/2014	RE: POA Message Docs	Attomey Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000703	Gadola, Michael	Snyder, Rick (GOV)	Gadola, Michael (GOV)		2/21/2014	RE: POA Message Docs	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000704	Gadola, Michael	Steven G. Howell' ; Brader, Valerie (GOV)	Gadola, Michael (GOV)		2/21/2014	RE: Plan of Adjustment & Pensioners	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000705	Gadola, Michael	Brader, Valerie (GOV) ; 'Steven G. Howell'	Gadola, Michael (GOV)		2/21/2014	RE: Plan of Adjustment & Pensioners	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000706	Gadola, Michael	Snyder, Rick (GOV); Muchmore, Dennis (GOV); Posthumus, Dick (GOV)	Gadola, Michael (GOV)	Scott, Allison (GOV); Brader, Valerie (GOV); Clement, Elizabeth (GOV)	2/21/2014	Retiree Committee	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000707	Gadola, Michael	Steven G. Howeli	Gadola, Michael (GOV)	Brader, Valerie (GOV)	2/22/2014	Re: Plan of Adjustment & Pensioners	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000708	Gadola, Michael	Steven G. Howell	Gadola, Michael (GOV)	Brader, Valerie (GOV)	2/24/2014	RE: Plan of Adjustment & Pensioners	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000709	Gadola, Michael	Steven G. Howell'	Gadola, Michael (GOV)	Brader, Valerie (GOV) ; West, Samantha (GOV)	2/24/2014	RE: Plan of Adjustment & Pensioners	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000710	Gadola, Michael	West, Samantha (GOV)	Gadola, Michael (GOV)		2/24/2014	RE: Plan of Adjustment & Pensioners	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000711	Gadola, Michael	Brock Swartzle'; Brader, Valerie (GOV); Schneider, Matthew (AG); Travis Weber; Brian Mills; Scott Starr	Gadola, Michael (GOV)		2/24/2014	RE: Mediation Confidential – memo regarding enjoining non-consenting retirees from suing the State	Attorney Client Communication; Mediation	Document/email discussing a subject incident to mediation

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PRIV_000712	Gadola, Michael	Valerie (GOV) ; Schneider, Matthew (AG) ; Flancher, Steven (AG)	Gadola, Michael (GOV)	Kester K. So; Peter H. Ellsworth; Dawn R. Copley; Allison R. Bach	2/24/2014	RE: plan of adjustment	Attorney Client Communication; Common Interest Agreement; Mediation	attorney; Document/email discussing a subject incident to mediation
PRIV_000713	Gadola, Michael	Brock Swartzle	Gadola, Michael (GOV)	Brader, Valerie (GOV) ; Schneider, Matthew (AG) ; Brian Mills ; Travis Weber ; Scott Starr	2/26/2014	Re: Mediation Confidential – memo regarding enjoining non-consenting retirees from suing the State	Attomey Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000714	Gadola, Michael	Brock Swartzle' ; Brader, Valerie (GOV) ; Schneider, Matthew (AG)	Gadola, Michael (GOV)	Brian Mills ; Scott Starr; Travis Weber	2/26/2014	RE: Bankruptcy	Mediation	Document/email discussing a subject incident to mediation
PRIV_000715	Gadola, Michael	Brock Swartzle'; Schneider, Matthew (AG)	Gadola, Michael (GOV)	Brader, Valerie (GOV); Brian Mills; Travis Weber; Scott Starr	2/26/2014	RE: Mediation Confidential – memo regarding enjoining non-consenting retirees from suing the State	Attomey Client Communication; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_000716	Gadola, Michael	Brock Swartzle'	Gadola, Michael (GOV)	Brader, Valerie (GOV); Schneider, Matthew (AG); Brian Mills; Travis Weber; Scott Starr	2/26/2014	RE: Mediation Confidential – memo regarding enjoining non-consenting retirees from suing the State	Mediation	Document/email discussing a subject incident to mediation
PRIV_000717	Gadola, Michael	Schneider, Matthew (AG) ; Brock Swartzle	Gadola, Michael (GOV)	Brader, Valerie (GOV) ; Brian Mills ; Travis Weber ; Scott Starr	2/26/2014	RE: Mediation Confidential – memo regarding enjoining non-consenting retirees from suing the State	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000718	Gadola, Michael	Brader, Valerie (GOV); Schneider, Matthew (AG); Steven G. Howell	Gadola, Michael (GOV)		2/27/2014	Conditions	Attorney Client Communication	Document/email containing communication with attorney
PRIV_000719	Gadola, Michael	Brader, Valerie (GOV)	Gadola, Michael (GOV)		2/27/2014	RE: Mediation Confidential – memo regarding enjoining non-consenting retirees from suing the State	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000720	Gadola, Michael	Schneider, Matthew (AG)	Gadola, Michael (GOV)	Brader, Valerie (GOV) ; Steven G. Howell	2/28/2014	RE: Mediation Confidential – memo regarding enjoining non-consenting retirees from suing the State	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000721	Gadola, Michael	Brock Swartzle'; Brader, Valerie (GOV); Schneider, Matthew (AG); Jennifer Dettloff	Gadola, Michael (GOV)	Brian Mills ; Scott Starr, Travis Weber ; Tedder, Greg (GOV)	3/3/2014	RE: Detroit	Mediation	Document/email discussing a subject incident to mediation
PRIV_000722	Gadola, Michael	Snyder, Rick (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV); Muchmore, Dennis (GOV); Posthumus, Dick (GOV)	Gadola, Michael (GOV)	Scott, Allison (GOV) ; Clement, Elizabeth (GOV)	3/3/2014	FW: Detroit	Attomey Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000723	Gadola, Michael	Brader, Valerie (GOV) ; Calley, Brian (GOV) ; Muchmore, Dennis (GOV)	Gadola, Michael (GOV)	Snyder, Rick (GOV); Baird, Richard (GOV); Scott, Allison (GOV); Tedder, Greg (GOV)	3/4/2014	RE: CONFIDENTIAL AND SUBJECT TO ATTY CLIENT PRIVILEGE	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000724	Gadola, Michael	Schneider, Matthew (AG)	Gadola, Michael (GOV)	Brader, Valerie (GOV) ; Steven G. Howell	3/5/2014	Re: Foundations	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000725	Gadola, Michael	Kester K. So	Gadola, Michael (GOV)	Steven G. Howell	3/5/2014	FW: Detroit	Mediation	Document/email discussing a subject incident to mediation
PRIV_000726	Gadola, Michael	West, Samantha (GOV)	Gadola, Michael (GOV)		3/5/2014	RE: Foundations	Mediation	Document/email discussing a subject incident to mediation
PRIV_000727	Gadola, Michael	Steven G. Howell'; Brader, Valerie (GOV); Schneider, Matthew (AG)	Gadola, Michael (GOV)	Kester K. So ; Peter H. Ellsworth ; Dawn R. Copley; Allison R. Bach	3/11/2014	RE: Conditions and Income Stabilization Payment	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation

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PRIV_000728	Gadola, Michael	Peter H. Ellsworth'; Schneider, Matthew (AG); Brader, Valerie (GOV); Steven G. Howell; Kester K. So; Flancher, Steven (AG)	Gadola, Michael (GOV)		3/12/2014	RE: Mich Settlement Authority Admin memo.docx	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000729	Gadola, Michael	Brader, Valerie (GOV) ; Schneider, Matthew (AG) ; Steven G. Howell ; Clinton, Kevin (TREASURY)	Gadola, Michael (GOV)	Lukasz Paszek ; Chris DeRose (CDeRose@mersofmich.com); Stoddard, Phil (DTMB)	3/12/2014	RE: CONFIDENTIAL AND SUBJECT TO MEDIATION ORDER – Discount Rate Backgrounder	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000730	Gadola, Michael	Brader, Valerie (GOV)	Gadola, Michael (GOV)		3/12/2014	RE: CONFIDENTIAL AND SUBJECT TO MEDIATION ORDER – Discount Rate Backgrounder	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000731	Gadola, Michael	Steven G. Howell'	Gadola, Michael (GOV)	Schneider, Matthew (AG) ; Brader, Valerie (GOV)	3/12/2014	RE: Prior to the Foundation Call	Attorney Client Communication; Mediation	Document/email containing communication with attorney
PRIV_000732	Gadola, Michael	Heather Lennox'	Gadola, Michael (GOV)	Brader, Valerie (GOV); Schneider, Matthew (AG); Steven G. Howell; David G. Heiman; Evan Miller	3/17/2014	RE: Conditions	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000733	Gadola, Michael	Brader, Valerie (GOV); Schneider, Matthew (AG); Steven G. Howell; Kester K. So	Gadola, Michael (GOV)		3/17/2014	FW: Term Sheet	Mediation	Document/email discussing a subject incident to mediation
PRIV_000734	Gadola, Michael	Brader, Valerie (GOV); Schneider, Matthew (AG); Steven G. Howell; Kester K. So	Gadola, Michael (GOV)		3/17/2014	FW: Revised Term Sheet	Mediation	Document/email discussing a subject incident to mediation
PRIV_000735	Gadola, Michael	Gerald_Rosen'	Gadola, Michael (GOV)	·	3/17/2014	RE: Revised Term Sheet	Mediation	Document/email discussing a subject incident to mediation
PRIV_000736	Gadola, Michael	Brader, Valerie (GOV); Schneider, Matthew (AG); Steven G. Howell	Gadola, Michael (GOV)		3/18/2014	FW: Conditions	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000737	Gadola, Michael	Gerald_Rosen	Gadola, Michael (GOV)		3/19/2014	Re: State conditions	Mediation	Document/email discussing a subject incident to mediation
PRIV_000738	Gadola, Michael	Gerald_Rosen'	Gadola, Michael (GOV)	·	3/21/2014	RE: State conditions	Mediation	Document/email discussing a subject incident to mediation
PRIV_000739	Gadola, Michael	Muchmore, Dennis (GOV); Posthumus, Dick (GOV); Brader, Valerie (GOV)	Gadola, Michael (GOV)	Wisniewski, Wendy (GOV); Rospond, Laurie (GOV); West, Samantha (GOV)	3/21/2014	FW: State conditions	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000740	Gadola, Michael	Gerald_Rosen; Edriker	Gadola, Michael (GOV)	Brader, Valerie (GOV) ; Steven G. Howell	3/21/2014	Revised conditions	Mediation	Document/email discussing a subject incident to mediation
PRIV_000741	Gadola, Michael	Scott, Allison (GOV)	Gadola, Michael (GOV)	Brader, Valerie (GOV); Tedder, Greg (GOV); Muchmore, Dennis (GOV); Posthumus, Dick (GOV); Emmitt, Beth (GOV)	3/23/2014	Re: Conf call today	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000742	Gadola, Michael	Brader, Valerie (GOV)	Gadola, Michael (GOV)	Snyder, Rick (GOV); Scott, Allison (GOV); Tedder, Greg (GOV); Muchmore, Dennis (GOV); Posthumus, Dick (GOV)	3/23/2014	Re: Conf call today	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000743	Gadola, Michael	Brader, Valerie (GOV) ; Muchmore, Dennis (GOV)	Gadola, Michael (GOV)		3/25/2014	RE: Negotiations with Don Taylor	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000744	Gadola, Michael	Tedder, Greg (GOV) ; Brader, Valerie (GOV)	Gadola, Michael (GOV)	Saxton, Thomas (Treasury)	3/25/2014	RE: CONFIDENTIAL AND SUBJECT TO MEDIATION ORDER	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000745	Gadola, Michael	Brader, Valerie (GOV)	Gadola, Michael (GOV)		3/25/2014	RE: Negotiations with Don Taylor	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation

Privileged Bates Begin	Custodian	Emall To	Email From	Email CC.	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000746	Gadola, Michael	Muchmore, Dennis (GOV)	Gadola, Michael (GOV)	Brader, Valerie (GOV)	3/25/2014	Re: Negotiations with Don Taylor	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject
11410_000740	Gadola, Michael	Macimole, Bennis (GGV)	Gaddia, Michael (GOV)	brader, valerie (GOV)	3/23/2014	The regulations with Don Taylor	Attorney client communication, Mediation	incident to mediation
							-	Document/email discussing a subject incident to
PRIV_000747	Gadola, Michael	Brader, Valerie (GOV)	Gadola, Michael (GOV)		3/25/2014	Re: Negotiations with Don Taylor	Mediation	mediation
	*					<u> </u>	-	Document/email containing communication with
PRIV_000748	Gadola, Michael	Brader, Valerie (GOV)	Gadola, Michael (GOV)	Muchmore, Dennis (GOV)	3/25/2014	Re: Negotiations with Don Taylor	Attorney Client Communication; Mediation	attorney; Document/email discussing a subject
								incident to mediation
						FW: CONFIDENTIAL AND SUBJECT TO		Document/email containing communication with
PRIV_000749	Gadola, Michael	West, Samantha (GOV)	Gadola, Michael (GOV)		3/26/2014	MEDIATION ORDER	Common Interest Agreement; Mediation	attorney; Document/email discussing a subject
						MEDITION CITIZET	,	incident to mediation
2001 200750		Saxton, Thomas (Treasury);			0.00.004	RE: CONFIDENTIAL AND SUBJECT TO		Document/email containing communication with
PRIV_000750	Gadola, Michael	Tedder, Greg (GOV)	Gadola, Michael (GOV)	Brader, Valerie (GOV) ; Pleyte, Beth (Treasury)	3/26/2014	MEDIATION ORDER	Common Interest Agreement; Mediation	attorney; Document/email discussing a subject
		<u> </u>		Brades Veleria (COVA) Kenter IV Co. Detec II Etterrett				incident to mediation
PRIV_000751	Gadola, Michael	Schneider, Matthew (AG); Dawn R. Copley	Gadola, Michael (GOV)	Brader, Valerie (GOV); Kester K. So; Peter H. Ellsworth; Steven G. Howell; Allison R. Bach	3/26/2014	RE: Potential pensioners claims against State	Attorney Client Communication	Document/email containing communication with
		R. Copiey	····	Steven G. nowell , Alison R. bach		+		attorney Document/email containing communication with
PRIV_000752	Gadola, Michael	Brader, Valerie (GOV)	Gadola, Michael (GOV)	Steven G. Howell	3/27/2014	RE: Retiree Committee	Attorney Client Communication; Mediation	attorney; Document/email discussing a subject
11(14_000752	Oddola, Michael	brader, valerie (CCV)	Oddola, Islicitaci (OOV)	Oteveri G. Howell	3/2//2014	T.C. Neuree Committee	Automey olient communication, wediation	incident to mediation
								Document/email containing communication with
PRIV 000753	Gadola, Michael	Steven G. Howell'	Gadola, Michael (GOV)	·	3/27/2014	RE: Release	Attorney Client Communication; Mediation	attorney; Document/email discussing a subject
	,		,					incident to mediation
		Staves C. Howell's Brades						Document/email containing communication with
PRIV_000754	Gadola, Michael	Steven G. Howell'; Brader, Valerie (GOV)	Gadola, Michael (GOV)	Schneider, Matthew (AG)	3/28/2014	RE: Release Structure	Attorney Client Communication; Mediation	attomey; Document/email discussing a subject
		Valetie (GOV)		<u></u>		<u></u>		incident to mediation
PRIV 000755	Gadola, Michael	EDriker'	Gadola, Michael (GOV)	Gerald E. Rosen ; Brader, Valerie (GOV)	3/31/2014	RE: Conditions	Mediation	Document/email discussing a subject incident to
	- Cadola, Michael		- Cadola, Mioridor (CCT)	ostate E. Hassin, Elader, Valoria (55 1)	Grotiletti	The defiations	i indudon	mediation
DDII / 000750	0 1 1 1 1			D 1 V 1 : (20)	4/5/0044			Document/email containing communication with
PRIV_000756	Gadola, Michael	Steven G. Howell	Gadola, Michael (GOV)	Brader, Valerie (GOV)	4/5/2014	Re: Issue re Pensions	Attorney Client Communication; Mediation	attorney; Document/email discussing a subject
								incident to mediation Document/email containing communication with
PRIV_000757	Gadola, Michael	Brader, Valerie (GOV)	Gadola, Michael (GOV)	Steven G. Howell ; West, Samantha (GOV)	4/7/2014	Re: Issue re Pensions	Attorney Client Communication; Mediation	attomey; Document/email discussing a subject
11(14_000)3/	Oddola, Michael	brader, valene (CCV)	Cadola, Islicitaci (CO F)	oteven of howelf, west, cumulation (GOV)	7///2014	The issue to Ferisions	Automey orient communication, wediation	incident to mediation
								Document/email containing communication with
PRIV_000758	Gadola, Michael	Steven G. Howell	Gadola, Michael (GOV)	Brader, Valerie (GOV) ; Saxton, Thomas (Treasury); Kester	4/7/2014	Re: Tomorrow	Attorney Client Communication; Mediation	attomey; Document/email discussing a subject
				K. So ; West, Samantha (GOV)			,	incident to mediation
DDIV 000750	Gadola, Michael	Brock Swartzie	Cadala Mishael (COV)	Brades Valerio (COVA - Travia Mahas - Brian Mills	4/9/2014	Re: Detroit	Mediation	Document/email discussing a subject incident to
PRIV_000759	Gadola, Michael	Brock Swartzie	Gadola, Michael (GOV)	Brader, Valerie (GOV) ; Travis Weber ; Brian Mills	4/9/2014	Re: Detroit	Mediation	mediation
		Brader, Valerie (GOV) ; Steven G.	· · · · · · · · · · · · · · · · · · ·					
		Howell : Kester K. So. Schneider.						
		Matthew (AG) ; Flancher, Steven						Document/email containing communication with
PRIV_000760	Gadola, Michael	(AG); 'PEllsworth@dickinson-	Gadola, Michael (GOV)]	4/15/2014	RE: State Contribution Agreement	Attorney Client Communication; Mediation	attorney; Document/email discussing a subject
	,,·	wright.com'; Dawn R. Copley;	, (/			J		incident to mediation
		Allison R. Bach					·	
1		(ABach@dickinson-wright.com)						}
+		Steven G. Howell' : Brader.						
	. \	Valerie (GOV); Kester K. So;				4510044		Document/email containing communication with
		I Schneider, Matthew (AG): I				I a. a		
PRIV_000761	Gadola, Michael	Schneider, Matthew (AG); Flancher, Steven (AG); Peter H.	Gadola, Michael (GOV)		4/15/2014	RE: State Contribution Agreement	Attorney Client Communication; Mediation	attomey; Document/email discussing a subject
PRIV_000761	Gadola, Michael	Schneider, Matthew (AG); Flancher, Steven (AG); Peter H. Ellsworth; Dawn R. Copley;	Gadola, Michael (GOV)		4/15/2014	RE: State Contribution Agreement	Attorney Client Communication; Mediation	attorney; Document/email discussing a subject incident to mediation

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PRIV_000762	Gadola, Michael	Steven G. Howell'; Brader, Valerie (GOV); Kester K. So; Schneider, Matthew (AG); Flancher, Steven (AG); Peter H. Ellsworth; Dawn R. Copley; Allison R. Bach	Gadola, Michael (GOV)		4/15/2014	RE: State Contribution Agreement	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000763	Gadola, Mi chael	Posthumus, Dick (GOV) ; Durfee, Sally (GOV) ; Ackerman, Darin (GOV)	Gadola, Michael (GOV)	Wurfel, Sara (GOV) ; Brader, Valerie (GOV) ; Tedder, Greg (GOV)	4/15/2014	Fwd: CONFIDENTIAL	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000764	Gadola, Michael	Posthumus, Dick (GOV); Durfee, Sally (GOV); Ackerman, Darin (GOV); Wurfel, Sara (GOV)	Gadola, Michael (GOV)	Tedder, Greg (GOV) ; Brader, Valerie (GOV)	4/15/2014	Fwd: State Contribution Agreement	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000765	Gadola, Michael	Brader, Valerie (GOV)	Gadola, Michael (GOV)	Wurfel, Sara (GOV); Snyder, Rick (GOV); Calley, Brian (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Posthumus, Dick (GOV); Tedder, Greg (GOV); Baird, Richard (GOV); Agen, Jarrod (GOV); Scott, Allison (GOV); Wisniewski, Wendy (GOV)	4/15/2014	Re: Revised plan of action on POA – Atty client, confidential	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000766	Gadola, Michael	Wurfel, Sara (GOV)	Gadola, Michael (GOV)	Brader, Valerie (GOV); Snyder, Rick (GOV); Calley, Brian (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Posthumus, Dick (GOV); Tedder, Greg (GOV); Baird, Richard (GOV); Agen, Jarrod (GOV); Scott, Allison (GOV); Wisniewski, Wendy (GOV)	4/15/2014	Re: DRAFT statement on Detroit agreement with AFSCME, retired police and firefighers	Attorney Client Communication; Executive	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000767	Gadola, Michael	Brock Swartzle' ; Brader, Valerie (GOV)	Gadola, Michael (GOV)	Brian Mills ; Scott Starr, Travis Weber ; West, Samantha (GOV) ; Tedder, Greg (GOV) ; Kester K. So; Steven G. Howell	4/16/2014	RE: Detroit	Mediation	Document/email discussing a subject incident to mediation
PRIV_000768	Gadola, Michael	Muchmore, Dennis (GOV); Posthumus, Dick (GOV)	Gadola, Michael (GOV)	Brader, Valerie (GOV); Tedder, Greg (GOV); Durfee, Sally (GOV)	4/16/2014	FW: Detroit	Mediation	
PRIV_000769	Gadola, Michael	Wurfel, Sara (GOV); Snyder, Rick (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV); Agen, Jarrod (GOV)	Gadola, Michael (GOV)	Scott, Allison (GOV)	4/16/2014	RE: Detroit - Second Amended Plan of Adjustment and Second Amended Disclosure Statement (As- Filed)	Attorney Client Communication	
PRIV_000770	Gadola, Michael	Snyder, Rick (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Wurfel, Sara (GOV); Agen, Jarrod (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV); Posthumus, Dick (GOV); Baird, Richard (GOV)	Gadola, Michael (GOV)	Scott, Allison (GOV)	4/16/2014	FW: Update	Attorney Client Communication	
PRIV_000771	Gadola, Michael	Snyder, Rick (GOV)	Gadola, Michael (GOV)	Wurfel, Sara (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV); Agen, Jarrod (GOV); Scott, Allison (GOV)	4/16/2014	Re: Detroit - Second Amended Plan of Adjustment and Second Amended Disclosure Statement (As- Filed)	Deliberative process; Executive; Mediation	
PRIV_000772	Gadola, Michael	Gerald_Rosen	Gadola, Michael (GOV)		4/16/2014	Fwd: Latest draft statement for Judge Rosen review	Mediation	Document/email discussing a subject incident to mediation
PRIV_000773	Gadola, Michael	Wurfel, Sara (GOV) ; Brader, Valerie (GOV)	Gadola, Michael (GOV)		4/16/2014	Fwd: Latest draft statement for Judge Rosen review	Mediation	· · · · · · · · · · · · · · · · · · ·
PRIV_000774	Gadola, Michael	Snyder, Rick (GOV)	Gadola, Michael (GOV)	Wurfel, Sara (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV); Agen, Jarrod (GOV); Scott, Allison (GOV)	4/16/2014	Re: Detroit - Second Amended Plan of Adjustment and Second Amended Disclosure Statement (As- Filed)	Attorney Client Communication; Mediation	

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PRIV_000775	Gadola, Michael	Kester K. So; Steven G. Howell; Brader, Valerie (GOV); Tedder, Greg (GOV)	Gadola, Michael (GOV)	Ackerman, Darin (GOV) ; Durfee, Sally (GOV)	4/17/2014	FW: Settlement Appropriations	Attorney Client Communication; Mediation	
PRIV_000776	Gadola, Michael	Kester K. So; Steven G. Howell	Gadola, Michael (GOV)	Brader, Valerie (GOV); Tedder, Greg (GOV); Durfee, Sally (GOV); Ackerman, Darin (GOV)	4/17/2014	FW: Detroit	Attorney Client Communication; Mediation	
PRIV_000777	Gadola, Michael	Posthumus, Dick (GOV); Muchmore, Dennis (GOV)	Gadola, Michael (GOV)	Durfee, Sally (GOV)	4/17/2014	FW: Detroit	Attorney Client Communication; Mediation	
PRIV_000778	Gadola, Michael	Brock Swartzie'	Gadola, Michael (GOV)	Brader, Valerie (GOV); Brian Mills; Scott Starr; Travis Weber; West, Samantha (GOV); Tedder, Greg (GOV); Kester K. So; Steven G. Howell	4/17/2014	RE: Detroit	Mediation	
PRIV_000779	Gadola, Michael	Kester K. So	Gadola, Michael (GOV)		4/17/2014	Re: Settlement Appropriations	Attorney Client Communication	
PRIV_000780	Gadola, Michael	West, Samantha (GOV)	Gadola, Michael (GOV)		4/17/2014	RE: Detroit	Attorney Client Communication; Mediation	
PRIV_000781	Gadola, Michael	West, Samantha (GOV)	Gadola, Michael (GOV)		4/17/2014	RE: Detroit	Attorney Client Communication; Mediation	
PRIV_000782	Gadola, Michael	Baird, Richard (GOV); Tedder, Greg (GOV)	Gadola, Michael (GOV)	Brader, Valerie (GOV)	4/18/2014	FW: Notice of mediation session – Subject to Mediation Confidentiality and Privilege	Attomey Client Communication; Mediation	
PRIV_000783	Gadola, Michael	Brader, Valerie (GOV)	Gadola, Michael (GOV)		4/18/2014	Re: Notice of mediation session – Subject to Mediation Confidentiality and Privilege	Attorney Client Communication; Mediation	
PRIV_000784	Gadola, Michael	Steven G. Howell	Gadola, Michael (GOV)		4/18/2014	Re: Notice of mediation session – Subject to Mediation Confidentiality and Privilege	Attomey Client Communication; Mediation	
PRIV_000785	Gadola, Michael	Brader, Valerie (GOV)	Gadola, Michael (GOV)		4/18/2014	FW: *Confidential: Fw: Privileged and Confidential Attorney-Client Communication (Outsourcing)	Attorney Client Communication	
PRIV_000786	Gadola, Michael	emiller@JonesDay.com	Gadola, Michael (GOV)	Kevyn Orr	4/18/2014	FW: *Confidential: Fw: Privileged and Confidential Attorney-Client Communication (Outsourcing)	Common Interest Agreement; Mediation	
PRIV_000787	Gadola, Michael	Steven G. Howell'	Gadola, Michael (GOV)		4/18/2014	RE: Notice of mediation session Subject to Mediation Confidentiality and Privilege	Attomey Client Communication; Mediation	
PRIV_000788	Gadola, Michael	Wurfel, Sara (GOV) ; Brader, Valerie (GOV)	Gadola, Michael (GOV)	Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Tedder, Greg (GOV); Posthumus, Dick (GOV); Agen, Jarrod (GOV); Wisniewski, Wendy (GOV); Scott, Allison (GOV)	4/18/2014	RE: HIGH PRIORITY: Speaker Bolger and Detroit	Attomey Client Communication	
PRIV_000789	Gadola, Michael	Steven G. Howell'	Gadola, Michael (GOV)	Brader, Valerie (GOV)	4/18/2014	RE: Monday	Attorney Client Communication; Mediation	
PRIV_000790	Gadola, Michael	Brian Easley	Gadola, Michael (GOV)	Kevyn Orr ; foxs@detroitmi.gov; David G. Heiman ; Heather Lennox ; Evan Miller	4/20/2014	Re: City of Detroit -Confidential Mediation Communication	Attorney Client Communication; Common Interest Agreement; Mediation	
PRIV_000791	Gadola, Michael	Gerald_Rosen	Gadola, Michael (GOV)		4/20/2014	Fwd: City of Detroit -Confidential Mediation Communication	Mediation	
PRIV_000792	Gadola, Michael	Brian Easley	Gadola, Michael (GOV)		4/20/2014	Re: City of Detroit -Confidential Mediation Communication	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	
PRIV_000793	Gadola, Michael	Gerald_Rosen	Gadola, Michael (GOV)		4/20/2014	Re: City of Detroit -Confidential Mediation Communication	Mediation	
PRIV_000794	Gadola, Michael	beasley@jonesday.com'; Kevyn Orr; 'Stacy Fox; David G. Heiman; Heather Lennox; emiller@JonesDay.com	Gadola, Michael (GOV)		4/21/2014	FW: City of Detroit - Confidential Mediation Communication	Mediation	
PRIV_000795	Gadola, Michael				4/18/2014	Letter of Agreement between the City of Detroit and the coalition of Detroit unions	Mediation	Document/email discussing a subject incident to mediation
PRIV_000796	Gadola, Michael	beasley@jonesday.com; Kevyn Олг; 'Stacy Fox; David G. Heiman; Heather Lennox; emiller@JonesDay.com	Gadola, Michael (GOV)		4/21/2014	FW: City of Detroit - Confidential Mediation Communication	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000797	Gadola, Michael	Tedder, Greg (GOV); Muchmore, Dennis (GOV)	Gadola, Michael (GOV)		4/21/2014	FW: City of Detroit -Confidential Mediation Communication	Attorney Client Communication; Mediation	

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PRIV_000798	Gadola, Michael	Stacy Fox'	Gadola, Michael (GOV)		4/21/2014	RE: FW: City of Detroit - Confidential Mediation Communication	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	
PRIV_000799	Gadola, Michael	Muchmore, Dennis (GOV); Posthumus, Dick (GOV); Baird, Richard (GOV); Tedder, Greg (GOV); Brader, Valerie (GOV)	Gadola, Michael (GOV)		4/21/2014	FW: City of Detroit - Confidential Mediation Communication	Mediation	Document/email discussing a subject incident to mediation
PRIV_000800	Gadola, Michael	Muchmore, Dennis (GOV); Tedder, Greg (GOV); Posthumus, Dick (GOV)	Gadola, Michael (GOV)	Wisniewski, Wendy (GOV)	4/21/2014	RE: City of Detroit -Confidential Mediation Communication	Attorney Client Communication; Common Interest Agreement; Mediation	
PRIV_000801	Gadola, Michael	Stacy Fox'	Gadola, Michael (GOV)		4/21/2014	RE: FW: City of Detroit - Confidential Mediation Communication	Attorney Client Communication; Common Interest Agreement; Mediation	
PRIV_000802	Gadola, Michael	Muchmore, Dennis (GOV); Posthumus, Dick (GOV); Baird, Richard (GOV); Tedder, Greg (GOV); Brader, Valerie (GOV)	Gadola, Michael (GOV)		4/21/2014	RE: City of Detroit - Confidential Mediation Communication	Attorney Client Communication; Mediation	
PRIV_000803	Gadola, Michael	Stacy Fox' ; Kevyn Orr ; Brian Easley	Gadola, Michael (GOV)	David G. Heiman ; Evan Miller ; Heather Lennox ; Willis Goldsmith < wgoldsmith@jonesday.com>	4/21/2014	RE: *Confidential: Privileged and Confidential Attorney-Client Communication (AFSCME Letter of Agreement)	Attorney Client Communication; Common Interest Agreement; Mediation	
PRIV_000804	Gadola, Michael	Baird, Richard (GOV); Muchmore, Dennis (GOV); Posthumus, Dick (GOV); Tedder, Greg (GOV); Brader, Valerie (GOV)	Gadola, Michael (GOV)		4/21/2014	RE: City of Detroit - Confidential Mediation Communication	Attorney Client Communication; Mediation	
PRIV_000805	Gadola, Michael	Gadola, Michael (GOV)	Muchmore, Dennis (GOV)		1/27/2014	Re: Detroit Pension Settlement - Notice - Confidential subject to Mediation Order	Attorney Client Communication; Mediation	,
PRIV_000806	Gadola, Michael	Jase Bolger; Snyder, Rick (GOV)	Muchmore, Dennis (GOV)	Norm Saari ; Brock Swartzle ; Gadola, Michael (GOV)	1/27/2014	Re: Detroit Pension Settlement - Notice - Confidential subject to Mediation Order	Attorney Client Communication; Mediation	
PRIV_000807	Gadola, Michael	Muchmore, Dennis (GOV)	Gadola, Michael (GOV)		1/27/2014	RE: Detroit Pension Settlement - Notice - Confidential subject to Mediation Order	Attorney Client Communication; Mediation	
PRIV_000808	Gadola, Michael	Brader, Valerie (GOV)	Gadola, Michael (GOV)		1/27/2014	FW: Detroit Pension Settlement - Notice - Confidential subject to Mediation Order	Attorney Client Communication; Mediation	
PRIV_000809	Gadola, Michael	Muchmore, Dennis (GOV)	Gadola, Michael (GOV)		1/27/2014	RE: Detroit Pension Settlement - Notice - Confidential subject to Mediation Order	Attorney Client Communication; Mediation	
PRIV_000810	Gadola, Michael	Snyder, Rick (GOV)	Gadola, Michael (GOV)	Brader, Valerie (GOV)	1/27/2014	RE: Detroit Pension Settlement - Notice - Confidential subject to Mediation Order	Attorney Client Communication; Mediation	
PRIV_000811	Governors Office					Notes from Governor's Office regarding settlement	Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_000812	Governors Office				<u> </u>	Summary of City's Plan of Adjustment	Mediation	Document/email discussing a subject incident to mediation
PRIV_000813	Governors Office				2/10/2014	Mediator's Response to House Conditions	Mediation	Document/email discussing a subject incident to mediation
PRIV_000814	Governors Office				2/10/2014	Presentation of the official committee of retirees	Attorney Work Product	Document/email containing attorney work product
PRIV_000815	Governors Office				2/10/2014	Segal Presentation to Governor	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000816	Governors Office					Conditions to Contribution by SOM	Mediation	Document/email discussing a subject incident to mediation

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		·						Document/email containing attorney work product;
PRIV_000817	Governors Office					Notes from Governor's Office regarding mediation	Attorney Work Product; Mediation	Document/email discussing a subject incident to
								mediation Document/email containing attorney work product;
PRIV 000818	Governors Office					Notes from Governor's Office regarding mediation	Attorney Work Product; Mediation	Document/email discussing a subject incident to
						and the second s	,,	mediation
								Document/email containing attorney work product;
PRIV_000819	Governors Office					Impact of Various Enhancements to	Attorney Client Communication; Attorney Work	•
						state/foundation/DIA contibutions	Product; Mediation	attorney; Document/email discussing a subject
								incident to mediation Document/email containing attorney work product;
						Email printed with notes regarding the Detroit plan of		Document/email containing attorney work product,
PRIV_000820	Governors Office				1/27/2014	adjustment from Bruce Bennett to Steven Howell	Common Interest Agreement; Mediation	attomey; Document/email discussing a subject
								incident to mediation
						Reason to pursue settlement notes from Governor's		Document/email containing attorney work product;
PRIV_000821	Governors Office					office	Attorney Work Product; Mediation	Document/email discussing a subject incident to
				· · · · · · · · · · · · · · · · · · ·				mediation Document/email containing attorney work product;
PRIV_000822	Governors Office		,			Comparison of Detroit police and firefighter wages	Attorney Work Product; Mediation	Document/email discussing a subject incident to
11/1/2_000022	GOVERNOIS OFFICE					from the Governor's office	Automos Work Floudos, Wediadon	mediation
								Document/email containing attorney work product;
PRIV_000823	Governors Office					DIA possible conditions	Attorney Work Product; Mediation	Document/email discussing a subject incident to
								mediation
DDIV 000004	0	# _~			City of Detroit: Tentative timeline for plan	Common Interest Agreement; Mediation	Document/email containing communication with	
PRIV_000824	Governors Office					confirmation process	Common interest Agreement, Mediation	attorney; Document/email discussing a subject incident to mediation
		_						Document/email containing attorney work product:
PRIV_000825	Governors Office				1/21/2014	Detroit Settlement conditions draft analysis	Attorney Work Product; Mediation	Document/email discussing a subject incident to
		·						mediation
PRIV_000826	Governors Office				1/21/2014	Preliminary discussion draft for Creditor proposals	Mediation	Document/email discussing a subject incident to
_								mediation Document/email containing attorney work product;
						_	Attorney Client Communication; Attorney Work	
PRIV_000827	Governors Office					Notes from Governor's office	Product; Mediation	attomey; Document/email discussing a subject
		L	· ·				,	incident to mediation
						_		Document/email containing attorney work product;
PRIV_000828	Governors Office				1/14/2014	Creditor claims treatment worksheet with notes from	Common Interest Agreement; Attorney Work	Document/email containing communication with
111112555525						governor's office	Product; Mediation	attorney; Document/email discussing a subject
								incident to mediation Document/email containing attorney work product;
 						Pension Income Stabilization program discussion	Common Interest Agreement; Attorney Work	Document/email containing attorney work product,
PRIV_000829	Governors Office				4/1/2014	draft	Product; Mediation	attomey; Document/email discussing a subject
								incident to mediation
PRIV_000830	Governors Office				4/1/2014	Conditions to Contribution by SOM	Mediation	Document/email discussing a subject incident to
		ļ		,				mediation
DDIV 000034	Covernor Office					Conditions to Contribution by SOM	Attorney Work Product; Mediation	Document/email containing attorney work product;
PRIV_000831	Governors Office					Conditions to Continuation by SOW	Automey Work Floudet, Mediation	Document/email discussing a subject incident to mediation
			-					Document/email containing attorney work product;
PRIV_000832	Governors Office					Proposed Structure for Income Stabilization	Attorney Work Product; Mediation	Document/email discussing a subject incident to
								mediation

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PRIV_000833	Governors Office					Proposed Structure for Income Stabilization	Mediation	Document/email discussing a subject incident to mediation
PRIV_000834	Governors Office				1/8/2014	Discussion of police and fire retirement system restructuring term sheet	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product, Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000835	Governors Office				12/11/2013	Draft of information from the office retirement systems regarding Detroit bankruptc	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000836	Governors Office				12/11/2013	Continued Draft of information from the office retirement systems regarding Detroit bankruptcy	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000837	Governors Office				12/11/2013	Continued Draft of information from the office retirement systems regarding Detroit bankruptcy.	Mediation	Document/email discussing a subject incident to mediation
PRIV_000838	Governors Office				·	Summary of City's plan of adjustment	Mediation	Document/email discussing a subject incident to mediation
PRIV_000839	Governors Office					House Republican Detroit Settlement Action plan	Mediation	Document/email discussing a subject incident to mediation
PRIV_000840	Governors Office				1/8/2014	Discussion of General Retirement System restructuring term sheet that was presented to GRS and AFSCME	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_000841	Governors Office				1/14/2014	Governor's office notes on creditor claims treatment	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_000842	Governors Office				1/14/2014	Discussion of contribution streams in PFRS and GRS – During 10 year period ending June 2023 and beyond	Common Interest Agreement; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_000843	Governors Office				Feb-14	Draft of Plan for the adjustment of debts of the city of Detroit filing	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_000844	Governors Office				2/25/2014	City of Detroit Plan of Adjustment 40 year projections	Common Interest Agreement; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_000845	Governors Office				2/25/2014	City of Detroit Plan of Adjustment 40 year projections	Common Interest Agreement; Mediation	Document/ernail containing attorney work product; Document/ernail discussing a subject incident to mediation
PRIV_000846	Governors Office				3/18/2014	Plan for the adjustment od debts summary discussion document	Common Interest Agreement; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_000847	Governors Office Valerie Bracler				9/18;/2014	Notes from V. Brader	Attomey Work Product	Document/email containing attorney work product
PRIV_000848	Governors Office Valerie Bracler	,			7/15/2013	Discussion materials and notes regarding the Detroit bankruptcy from Valerie Brader	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product, Document/email containing communication with attorney
PRIV_000849	Governors Office Valerie Bracler				12/11/2013	Materials prepared for discussion regarding the Detroit Water and Sewerage Department	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product; Document/email containing communication with attorney
PRIV_000850	Governors Office Valerie Bracler				Dec-13	Treatment Provisions for classes of creditors and notes from the Governor's office	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product; Document/email containing communication with attorney

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject (-	Privilege Type	Privilege Descriptions
PRIV_000851	Governors Office Valerie Bracler				5/12/2013	Executive Summary of financial and operating plan	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product; Document/email containing communication with attorney
PRIV_000852	Governors Office Valerie Bracler					Summary of long-term retiree health/OPEB proposal	Attorney Client Communication; Attorney Work Product	Document/email containing attorney work product; Document/email containing communication with attorney
PRIV_000853	Governors Office Valerie Bracler					City of Detroit Mediation discussion	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000854	Governors Office Valerie Bracler				9/17/2013	Notes from governor's office regarding state pensions and the Detroit bankruptcy	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000855	Governors Office Valerie Bracler	·				Notes from Valerie Brader regarding the Detroit mediation	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000856	Governors Office Valerie Bracler		:		12/10/2013	City of Detroit – Post-Bankruptcy oversight notes from Valerie Brader	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000857	Governors Office Valerie Bracler	,				Open issues in Chapter 9 plan of adjustment	Attorney Client Communication; Common Interest Agreement	Document/email containing communication with attorney
PRIV_000858	Governors Office Valerie Bracler					Key Points for plan of adjustment document	Attorney Client Communication; Common Interest Agreement	Document/email containing communication with attorney
PRIV_000859	Governors Office Valerie Bracler				2/19/2014	Talking points for plan of adjustment and disclosure statement	Mediation	Document/email discussing a subject incident to mediation
PRIV_000860	Governors Office Valerie Bracler				4/15/2014	Email print out of drat summary of POA changes.	Attorney Client Communication; Common Interest Agreement	Document/email containing communication with attorney
PRIV_000861	Governors Office Valerie Bracler				3/22/2014	Discussion draft regarding restricting Detroit	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000862	Governors Office Valerie Bracler	Valerie Brader	Governor Snyder, Mike Gadola		2/5/2014	итбо	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000863	Governors Office Valerie Bracler	Valerie Brader	Governor Snyder; Mike Gadola		.2/5/2014	итбо	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000864	Governors Office Valerie Bracler	Muchmore, Dennis; Snyder, Rick, Brader, Valerie, Allison, Scott, Ackerman, Darin, Posthumus, Dick, Tedder, Greg, Durfee, Sally, Stacy Fox	Kevyn Orr		2/4/2014	Michigan AFSCME on Governor Snyder's Proposal	Mediation	Document/email discussing a subject incident to mediation
PRIV_000865	Governors Office Valerie Bracler	,			Feb-14	Plan of adjustment considerations	Mediation	Document/email discussing a subject incident to mediation
PRIV_000866	Governors Office Valerie Bracler	Valerie Brader	Rick Snyder		1/19/2014	Detroit Settlement Conditions	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000867	Governors Office Valerie Bracler				1/19/2014	Detroit Settlement Conditions draft analysis	Mediation	Document/email discussing a subject incident to mediation

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000868	Governors Office Valerie Bracler	·	\$100pg 7455bg 15.64		1/19/2014	Detroit Settlement Conditions draft analysis	Mediation	Document/email discussing a subject incident to mediation
PRIV_000869	Governors Office Valerie Bracler	Rick Snyder	Valerie Brader	Allison Scott, Dennis Muchmore, Michael Gadola, John Roberts	1/20/2014	Settlement Terms Framing	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000870	Governors Office Valerie Bracler					City of Detroit tentative time line for plan confirmation process	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000871	Governors Office Valerie Bracler			·	1/18/2014	Discussion of GRS restricting term sheet that was presented to GRS and AFSCME	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing attorney work product; Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000872	Governors Office Valerie Bracler				1/8/2014	Discussion of Police and Fire retirement system restricting term sheet that was presented to PFRS and Detroit Uniform Unions	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing attorney work product, Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000873	Governors Office Valerie Bracler	Rick Snyder	Valerie Brader	Michael Gadola; Dennis Muchmore, Greg Tedder	10/24/2014	For meeting with Judge Rosen tornorrow	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000874	Governors Office Valerie Bracler				10/7/2013	State of Michigan's confidential additional mediation statement filed with the court	Mediation	Document/email discussing a subject incident to mediation
PRIV_000875	Headen, Fred	Dillon, Andy (Treasury); Saxton, Thomas (Treasury); Stibitz, Brom (Treasury) >	Headen, Frederick (Treasury)		7/9/2013	RE: Detroit Pension Meeting/Conference Call at 4:15	Attorney Client Communication; Common Interest Agreement	Document/email containing communication with attorney
PRIV_000876	Headen, Fred	Dillon, Andy (Treasury)	Headen, Frederick (Treasury)	Saxton, Thomas (Treasury); Stibitz, Brom (Treasury); Baird, Richard (GOV)	7/9/2013	RE: Detroit Pension Meeting/Conference Call at 4:15	Attomey Client Communication; Common Interest Agreement	Document/email containing communication with attorney
PRIV_000877	Muchmore, Dennis				2/14/2014	Detroit Retirees Analysis v 1	Mediation	Document/email discussing a subject incident to mediation
PRIV_000878	Muchmore, Dennis					Amended Plan of Adjustment Summary of Material Changes v 1	Mediation	Document/email discussing a subject incident to mediation
PRIV_000879	Muchmore, Dennis					Caucus talking points re settlement	Mediation	Document/email discussing a subject incident to mediation
PRIV_000880	Muchmore, Dennis	Brader, Valerie (GOV); Wurfel, Sara (GOV); Muchmore, Dennis (GOV); Roberts, John (GOV)	Tedder, Greg (GOV)		1/13/2014	FW: any problem with this statement?	M ediation	Document/email discussing a subject incident to mediation
PRIV_000881	Muchmore, Dennis	Snyder, Rick (GOV)	Gadola, Michael (GOV)	Brader, Valerie (GOV); Muchmore, Dennis (GOV); Roberts, John (GOV); Scott, Allison (GOV)	1/20/2014	Re: Detroit Mediation Settlement Terms; Notice: Confidential - mediation related	Attorney Client Communication; Mediation	Document/email containing communication with attorney
PRIV_000882	Muchmore, Dennis	Snyder, Rick (GOV) ; Scott, Allison (GOV) ; Gadola, Michael (GOV)	Brader, Valerie (GOV)	Tedder, Greg (GOV); Muchmore, Dennis (GOV); Posthumus, Dick (GOV)	3/23/2014	RE: Conf call today	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing communication with attorney
PRIV_000883	Muchmore, Dennis	Snyder, Rick (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Gadola, Michael (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV); Agen, Jarrod (GOV)	Wurfel, Sara (GOV)	Scott, Allison (GOV)	4/16/2014	FW: Detroit - Second Amended Plan of Adjustment and Second Amended Disclosure Statement (As- Filed)	Mediation	Document/email discussing a subject incident to mediation
PRIV_000884	Muchmore, Dennis	Wurfel, Sara (GOV); Snyder, Rick (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV); Agen, Jarrod (GOV)	Gadola, Michael (GOV)	Scott, Allison (GOV)	4/16/2014	RE: Detroit - Second Amended Plan of Adjustment and Second Amended Disclosure Statement (As-Filed)	Mediation	Document/email discussing a subject incident to mediation

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000885	Muchmore, Dennis	Snyder, Rick (GOV)	Wurfel, Sara (GOV)	Gadola, Michael (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV); Agen, Jarrod (GOV); Scott, Allison (GOV)	4/16/2014	Re: Detroit - Second Amended Plan of Adjustment and Second Amended Disclosure Statement (As- Filed)	Mediation	Document/email discussing a subject incident to mediation
PRIV_000886	Muchmore, Dennis	Snyder, Rick (GOV)	Muchmore, Dennis (GOV)	Brader, Valerie (GOV) ; Gadola, Michael (GOV) ; Rustem, William (GOV)		FW: Detroit water sewer/Oakland county	Attorney Client Communication	Document/email containing communication with attorney
PRIV_000887	Muchmore, Dennis	Brader, Valerie (GOV)	Muchmore, Dennis (GOV)		10/4/2013	RE: DIA "Proposal" to State	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000888	Muchmore, Dennis	Snyder, Rick (GOV)	Brader, Valerie (GOV)	Scott, Allison (GOV); Tedder, Greg (GOV); Muchmore, Dennis (GOV); Clinton, Kevin (TREASURY)	1/10/2014	subject to mediation order –confidential	Mediation	Document/email discussing a subject incident to mediation
PRIV_000889	Muchmore, Dennis					List of foundation conditions	Mediation	Document/email discussing a subject incident to mediation
PRIV_000890	Muchmore, Dennis	Tedder, Greg (GOV); Agen, Jarrod (GOV); Wurfel, Sara (GOV); Snyder, Rick (GOV); Scott, Allison (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Roberts, John (GOV); Clinton, Kevin (TREASURY); Saxton, Thomas (Treasury)	Brader, Valerie (GOV)		2/20/2014	Fwd: Plan of Adjustment CONFIDENTIAL SUBJECT TO CI AND MEDIATION ORDER	Common Interest Agreement; Mediation	Document/email discussing a subject incident to mediation
PRIV_000891	Muchmore, Dennis	Gadola, Michael (GOV); Agen, Jarrod (GOV); Murray, David (GOV); Steven G. Howell; Schneider, Matthew (AG); Flancher, Steven (AG); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Ellison, Melanie (GOV); Scott, Allison (GOV)	Brader, Valerie (GOV)		3/31/2014	Fwd: POA	Common Interest Agreement	Document/email discussing a subject incident to mediation
PRIV_000892	Muchmore, Dennis					Amended Plan of Adjustment Summary of Material Changes v	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000893	Muchmore, Dennis	Muchmore, Dennis (GOV)	Gadola, Michael (GOV)		4/1/2014	FW: Detroit: amended POA	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000894	Muchmore, Dennis	Brader, Valerie (GOV); Gadola, Michael (GOV); Baird, Richard (GOV); Agen, Jarrod (GOV); Posthumus, Dick (GOV)	Tedder, Greg (GOV)	Muchmore, Dennis (GOV) ; Wisniewski, Wendy (GOV)	4/11/2014	Post governance language for the plan of adjustment	Mediation	Document/email discussing a subject incident to mediation
PRIV_000895	Muchmore, Dennis				10/2/2013	Draft Analysis of New Water/Sewer Authority	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000896	Muchmore, Dennis	Muchmore, Dennis (GOV); Tedder, Greg (GOV)	Brader, Valerie (GOV)		10/29/2013	RE: DWSD	Attorney Client Communication	Document/email containing communication with attorney
PRIV_000897	Muchmore, Dennis	Muchmore, Dennis (GOV)	Tedder, Greg (GOV)	Wisniewski, Wendy (GOV)	12/18/2013	FW: ELB - need for meeting	Mediation	Document/email discussing a subject incident to mediation
PRIV_000898	Muchmore, Dennis	Headen, Frederick (Treasury); Saxton, Thomas (Treasury); Muchmore, Dennis (GOV); Tedder, Greg (GOV)	Brader, Valerie (GOV)	Clinton, Kevin (DIFS); Wisniewski, Wendy (GOV); Stanton, Terry A. (Treasury); Dillon, Andy (Treasury); Roberts, John (GOV)	10/30/2013	RE: City of Detroit – Loan Board Submission –ATTY CLIENT COMMUNICATION AND JOINT DEFENSE PROTECTED	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation

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Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000899	Muchmore, Dennis	Muchmore, Dennis (GOV)	Buckfire, Kenneth <ken.buckfire@millerbuckfire.co m></ken.buckfire@millerbuckfire.co 	wiesnieskiw@michigan.gov	10/17/2013	Background Info for Kevin Clinton	Attorney Client Communication; Mediation	
PRIV_000900	Muchmore, Dennis		100		10/7/2013	Detroit Financial Restructuring Summary v 3	Attorney Client Communication; Mediation	1
PRIV_000901	Muchmore, Dennis	Muchmore, Dennis (GOV)	Wisniewski, Wendy (GOV)		10/31/2013	Two AB Group Documents - Word format		
PRIV_000902	Muchmore, Dennis	Snyder, Rick (GOV)	Tedder, Greg (GOV)	Brader, Valerie (GOV); Gadola, Michael (GOV); Muchmore, Dennis (GOV); Roberts, John (GOV); Scott, Allison (GOV)	12/19/2013	RE: Pension leadership issue re Detroit	Attorney Client Communication; Mediation	
PRIV_000903	Muchmore, Dennis					Upon further review, this document should not have been included with privilege log. It is nonresponsive	Attorney Client Communication; Mediation	
PRIV_000904	Muchmore, Dennis	Muchmore, Dennis (GOV)	Brader, Valerie (GOV)	Scott, Allison (GOV); Tedder, Greg (GOV); Priest, Chris (GOV); Clinton, Kevin (TREASURY); Roberts, John (GOV); Rustem, William (GOV); Snyder, Rick (GOV)	12/31/2013	Re: For tomorrow	Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000905	Muchmore, Dennis	Snyder, Rick (GOV); Scott, Allison (GOV); Brader, Valerie (GOV); Lukasz Paszek; Clinton, Kevin (TREASURY); Saxton, Thomas (Treasury); Priest, Chris (GOV); Rustem, William (GOV)	Tedder, Greg (GOV)	Muchmore, Dennis (GOV); Roberts, John (GOV)	1/6/2014	Fwd: Draft of update for Gov	Attorney Client Communication; Mediation	Document/email discussing a subject incident to mediation
PRIV_000906	Muchmore, Dennis				1/6/2014	Update for Governor	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000907	Muchmore, Dennis	Muchmore, Dennis (GOV) ; Posthumus, Dick (GOV)	Gadola, Michael (GOV)		2/7/2014	Fwd: Bankruptcy Settlement	Attorney Client Communication; Mediation	Document/email discussing a subject incident to mediation
PRIV_000908	Muchmore, Dennis	Muchmore, Dennis (GOV) ; Posthumus, Dick (GOV)	Gadola, Michael (GOV)		2/7/2014	Fwd: Bankruptcy Settlement	Attorney Client Communication; Mediation	Document/email discussing a subject incident to mediation
PRIV_000909	Muchmore, Dennis	Muchmore, Dennis (GOV)	Patricia Woodworth		2/17/2014	A question about funding for Detroit		Document/email discussing a subject incident to mediation
PRIV_000910	Muchmore, Dennis	Muchmore, Dennis (GOV)	Patricia Woodworth		2/18/2014	Re: A question about funding for Detroit	,	Document/email discussing a subject incident to mediation
PRIV_000911	Muchmore, Dennis	Muchmore, Dennis (GOV); Wurfel, Sara (GOV); Agen, Jarrod (GOV); Brader, Valerie (GOV); Gadola, Michael (GOV); Baird, Richard (GOV); 'lukasz@paszek.com'; Priest, Chris (GOV)	Tedder, Greg (GOV)	Scott, Allison (GOV) ; Wisniewski, Wendy (GOV)	2/20/2014	FW: Final Message Docs	Attomey Client Communication; Mediation	Document/email discussing a subject incident to mediation
PRIV_000912	Muchmore, Dennis				2/20/2014	Draft talking points statement/summary of plan	Attorney Client Communication; Mediation	Document/email discussing a subject incident to mediation
PRIV_000913	Muchmore, Dennis				2/20/2014	Draft talking points for plan of adjustment	Attorney Client Communication; Mediation	Document/email discussing a subject incident to mediation
PRIV_000914	Muchmore, Dennis					Overview of Detroit v 3	Attorney Client Communication; Mediation	Document/email discussing a subject incident to mediation
PRIV_000915	Muchmore, Dennis	Posthumus, Dick (GOV) ; Muchmore, Dennis (GOV)	Gadola, Michael (GOV)		2/24/2014	RE: Detroit Bankruptcy and Leaders	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000916	Muchmore, Dennis	Gadola, Michael (GOV) ; Muchmore, Dennis (GOV)	Posthumus, Dick (GOV)		2/24/2014	RE: Detroit Bankruptcy and Leaders	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject Subject	Privilege Type	Privilege Descriptions
PRIV_000917	Muchmore, Dennis	Brader, Valerie (GOV) ; Tedder, Greg (GOV)	Snyder, Rick (GOV)	Gadola, Michael (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Emmitt, Beth (GOV); Posthumus, Dick (GOV)	2/25/2014	Detroit Conditions - Confidential matter subject to mediation order	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000918	Muchmore, Dennis	Snyder, Rick (GOV)	Brader, Valerie (GOV)	Gadola, Michael (GOV); Scott, Allison (GOV); Tedder, Greg (GOV); Muchmore, Dennis (GOV); Posthumus, Dick (GOV)	3/24/2014	RE: Conf call today	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000919	Muchmore, Dennis	Muchmore, Dennis (GOV)	Danhof, William J. <danhof@millercanfield.com></danhof@millercanfield.com>	Danhof, William J. <danhof@millercanfield.com></danhof@millercanfield.com>	3/24/2014	RE: Memo on bonding	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	Document/email containing communication with attorney
PRIV_000920	Muchmore, Dennis					Securitizing State promise to pay	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000921	Muchmore, Dennis	Baird, Richard (GOV); Muchmore, Dennis (GOV); Tedder, Greg (GOV); Woosley Scott <woosley@imfa.com>; Gadola, Michael (GOV)</woosley@imfa.com>	Brader, Valerie (GOV)	Schneider, Matthew (AG) ; Steven G. Howell	3/28/2014	TARP funds	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000922	Muchmore, Dennis				2/18/2014	DWSD proposal	Mediation	Document/email discussing a subject incident to mediation
PRIV_000923	Muchmore, Dennis					Legislative letter	Mediation	Document/email discussing a subject incident to mediation
PRIV_000924	Muchmore, Dennis	Muchmore, Dennis (GOV) ; Posthumus, Dick (GOV)	Gadola, Michael (GOV)	Brader, Valerie (GOV) ; Tedder, Greg (GOV) ; Durfee, Sally (GOV)	4/16/2014	FW: Detroit	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000925	Muchmore, Dennis	Muchmore, Dennis (GOV) ; Tedder, Greg (GOV)	Gadola, Michael (GOV)		9/26/2013	FW: Mediation Notes - SUBJECT TO (1) ATTORNEY CLIENT & WORK PRODUCT PRIVILEGES AND FRE 408 - CONFIDENTIAL	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000926	Muchmore, Dennis		*		9/26/2013	Draft mediation discussion v 1	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000927	Muchmore, Dennis				9/17/2013	Mediation discussion notes	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000928	Muchmore, Dennis	Valerie Brader	Rick Snyder		10/3/2013	Memo re legal argument	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000929	Muchmore, Dennis	Brader, Valerie (GOV); Gadola, Michael (GOV); Muchmore, Dennis (GOV); Roberts, John (GOV); Holyfield, Jeff (GOV); Wurfel, Sara (GOV); Rustem, William (GOV)	Murray, David (GOV)		10/4/2013	RE: DIA "Proposal" to State	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000930	Muchmore, Dennis	Snyder, Rick (GOV)	Brader, Valerie (GOV)	Gadola, Michael (GOV); Muchmore, Dennis (GOV); Tedder, Greg (GOV)	10/24/2013	For meeting with Judge Rosen tomorrow	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000931	Muchmore, Dennis	Muchmore, Dennis (GOV); Roberts, John (GOV)	Scott, Allison (GOV)	·	11/5/2013	FW: Rosen letter	Mediation	Document/email discussing a subject incident to mediation
PRIV_000932	Muchmore, Dennis				11/5/2013	Letter to J. Rosen from R. Snyder	Mediation	Document/email discussing a subject incident to mediation

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PRIV_000933	Muchmore, Dennis	Snyder, Rick (GOV)	Brader, Valerie (GOV)	Gadola, Michael (GOV); Muchmore, Dennis (GOV); Rustem, William (GOV); Tedder, Greg (GOV); Scott, Allison (GOV); Roberts, John (GOV)	11/27/2013	Decisions Needed re DWSD	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000934	Muchmore, Dennis	R. Snyder	V. Brader		11/27/2013	DWSD	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing attorney work product, Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000935	Muchmore, Dennis				12/19/2013	Detroit mediation outline	Attorney Client Communication; Mediation	Document/email containing attorney work product Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000936	Muchmore, Dennis	Muchmore, Dennis (GOV)	Roberts, John (GOV)	Wisniewski, Wendy (GOV)	12/19/2013	Fwd: Detroit Mediation call information	Mediation	Document/email discussing a subject incident to mediation
PRIV_000937	Muchmore, Dennis	Snyder, Rick (GOV); Muchmore, Dennis (GOV); Roberts, John (GOV); Posthumus, Dick (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV)	Gadola, Michael (GOV)	Scott, Allison (GOV)	12/26/2013	Mediation—Confidential attorney-client communication and subject to non-disclosure under federal court mediation order/rules	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation; Email containing predecisional deliberations
PRIV_000938	Muchmore, Dennis	Andy Dillon	Tom Saxton		Oct-12	Updates tobacco securitization/lottery revenue bonds	Mediation	Document/email discussing a subject incident to mediation
PRIV_000939	Muchmore, Dennis					Appendix A to A. Dillon Memo Projected TSRs	Mediation	Document/email discussing a subject incident to mediation
PRIV_000940	Muchmore, Dennis	Gadola, Michael (GOV); Snyder, Rick (GOV); Muchmore, Dennis (GOV); Roberts, John (GOV); Posthumus, Dick (GOV); Tedder, Greg (GOV)	Brader, Valerie (GOV)	Scott, Allison (GOV)	12/26/2013	RE: MediationConfidential attorney-client communication and subject to non-disclosure under federal court mediation order/rules	Attorney Client Communication; Mediation	Document/ernail containing communication with attorney; Document/ernail discussing a subject incident to mediation
PRIV_000941	Muchmore, Dennis	Gadola, Michael (GOV)	Snyder, Rick (GOV)	Brader, Valerie (GOV); Muchmore, Dennis (GOV); Roberts, John (GOV); Posthumus, Dick (GOV); Tedder, Greg (GOV); Scott, Allison (GOV)	12/27/2013	Re: Mediation–Confidential attorney-client communication and subject to non-disclosure under federal court mediation order/rules	Attorney Client Communication; Deliberative process; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000942	Muchmore, Dennis	Muchmore, Dennis (GOV); Roberts, John (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV); Posthumus, Dick (GOV)	Gadola, Michael (GOV)		12/27/2013	Fwd: Mediation—Confidential attorney-client communication and subject to non-disclosure under federal court mediation order/rules	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000943	Muchmore, Dennis	Snyder, Rick (GOV)	Gadola, Michael (GOV)	Brader, Valerie (GOV); Muchmore, Dennis (GOV); Roberts, John (GOV); Posthumus, Dick (GOV); Tedder, Greg (GOV); Scott, Allison (GOV)	12/27/2013	Re: Mediation-Confidential attorney-client communication and subject to non-disclosure under federal court mediation order/rules	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000944	Muchmore, Dennis	Muchmore, Dennis (GOV); Gadola, Michael (GOV); Roberts, John (GOV); Tedder, Greg (GOV); Posthumus, Dick (GOV)	Brader, Valerie (GOV)		12/27/2013	RE: Mediation—Confidential attorney-client communication and subject to non-disclosure under federal court mediation order/rules	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000945	Muchmore, Dennis	Brader, Valerie (GOV)	Gadola, Michael (GOV)	Muchmore, Dennis (GOV); Roberts, John (GOV); Tedder, Greg (GOV); Posthumus, Dick (GOV)	12/27/2013	Re: Mediation—Confidential attorney-client communication and subject to non-disclosure under federal court mediation order/rules	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000946	Muchmore, Dennis	Muchmore, Dennis (GOV)	Gadola, Michael (GOV)		12/27/2013	RE: Mediation—Confidential attorney-client communication and subject to non-disclosure under federal court mediation order/rules	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation

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Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000947	Muchmore, Dennis	Snyder, Rick (GOV); Muchmore, Dennis (GOV); Roberts, John (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV)	Wurfel, Sara (GOV)		1/12/2014	RE: Notice: subject to mediation	Mediation	Document/email discussing a subject incident to mediation
PRIV_000948	Muchmore, Dennis	Wurfel, Sara (GOV)	Snyder, Rick (GOV)	Muchmore, Dennis (GOV); Roberts, John (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV)	1/12/2014	Re: Notice: subject to mediation	Mediation	Document/email discussing a subject incident to mediation
PRIV_000949	Muchmore, Dennis	Muchmore, Dennis (GOV); Roberts, John (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV); Wurfel, Sara (GOV); Scott, Allison (GOV)	Snyder, Rick (GOV)		1/13/2014	Fwd: Deal could come as early as today to protect DIA art, Detroit pen	Mediation	Document/email discussing a subject incident to mediation
PRIV_000950	Muchmore, Dennis	Snyder, Rick (GOV); Muchmore, Dennis (GOV); Roberts, John (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV); Scott, Allison (GOV)	Wurfel, Sara (GOV)		1/13/2014	RE: Deal could come as early as today to protect DIA art, Detroit pen	Mediation	Document/email discussing a subject incident to mediation
PRIV_000951	Muchmore, Dennis				1/9/2014	Draft Chapter 9 Mediation Announcement Agenda	Mediation	Document/email discussing a subject incident to mediation
PRIV_000952	Muchmore, Dennis	Snyder, Rick (GOV); Muchmore, Dennis (GOV); Posthumus, Dick (GOV)	Gadola, Michael (GOV)	Scott, Allison (GOV) ; Brader, Valerie (GOV) ; Clement, Elizabeth (GOV)	2/21/2014	Retiree Committee	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000953	Muchmore, Dennis	R. Snyder	V. Brader		8/2/2013	Memo re pension policy changes	Attorney Client Communication; Attorney Work Product	Document/email containing attorney work product; Document/email containing communication with attorney
PRIV_000954	Muchmore, Dennis	Snyder, Rick (GOV); Muchmore, Dennis (GOV); Roberts, John (GOV)	Gadola, Michael (GOV)	Scott, Allison (GOV) ; Brader, Valerie (GOV) ; Tedder, Greg (GOV)	9/22/2013	Pension issue	Attorney Client Communication	Document/email containing communication with attorney
PRIV_000955	Muchmore, Dennis					Key points for plan of adjustment v 1	Attorney Client Communication; Common Interest Agreement	Document/email containing attorney work product; Document/email containing communication with attorney
PRIV_000956	Muchmore, Dennis					Open issues in plan of adjustment	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product; Document/email containing communication with attorney
PRIV_000957	Muchmore, Dennis	Snyder, Rick (GOV)	Brader, Valerie (GOV)	Calley, Brian (GOV); Muchmore, Dennis (GOV); Clinton, Kevin (TREASURY); Stoddard, Phil (DTMB); Vanden Bosch, Kerrie (DTMB); lukasz@paszek.com; Tedder, Greg (GOV); Saxton, Thomas (Treasury)	1/2/2014	Detroit mediation – confidential – pensions	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000958	Muchmore, Dennis				1/2/2014	Benefits Comparison	Mediation	Document/email discussing a subject incident to mediation
PRIV_000959	Muchmore, Dennis	Muchmore, Dennis (GOV); Brader, Valerie (GOV); Posthumus, Dick (GOV); Ackerman, Darin (GOV)	Durfee, Sally (GOV)		2/4/2014	Fwd: Michigan AFSCME on Governor Snyder's Proposal - City of Detroit	Mediation	Document/email discussing a subject incident to mediation
PRIV_000960	Muchmore, Dennis	Muchmore, Dennis (GOV); Snyder, Rick (GOV); Brader, Valerie (GOV)	Kevyn Orr	Scott, Allison (GOV); Ackerman, Darin (GOV); Posthumus, Dick (GOV); Tedder, Greg (GOV); Durfee, Sally (GOV); Stacy Fox	2/4/2014	RE: Michigan AFSCME on Governor Snyder's Proposal - City of Detroit	Mediation	Document/email discussing a subject incident to mediation
PRIV_000961	Muchmore, Dennis	Brader, Valerie (GOV)	Gadola, Michael (GOV)	Schneider, Matthew (AG) ; Muchmore, Dennis (GOV)	4/11/2014	Re: Draft Pension Trust Legislation	Attorney Client Communication	Document/email containing communication with attorney
PRIV_000962	Muchmore, Dennis	Gadola, Michael (GOV)	Schneider, Matthew (AG)	Brader, Valerie (GOV); Muchmore, Dennis (GOV)	4/11/2014	Re: Draft Pension Trust Legislation	Attorney Client Communication	Document/email containing communication with attorney

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000963	Muchmore, Dennis	Snyder, Rick (GOV)	Brader, Valerie (GOV)	lukasz@paszek.com; Scott, Allison (GOV); Muchmore, Dennis (GOV); Roberts, John (GOV)	1/20/2014	CONFIDENTIAL: numbers	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000964	Muchmore, Dennis					Estimate of Straight Cut Decrease	Mediation	Document/email discussing a subject incident to mediation
PRIV_000965	Muchmore, Dennis					Litigation costs Detroit Settlement	Mediation	Document/email discussing a subject incident to mediation
PRIV_000966	Muchmore, Dennis	Brader, Valerie (GOV) ; Calley, Brian (GOV) ; Muchmore, Dennis (GOV)	Gadola, Michael (GOV)	Snyder, Rick (GOV); Baird, Richard (GOV); Scott, Allison (GOV); Tedder, Greg (GOV)	3/4/2014	RE: CONFIDENTIAL AND SUBJECT TO ATTY CLIENT PRIVILEGE	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000967	Muchmore, Dennis	Brader, Valerie (GOV)	Calley, Brian (GOV)	Muchmore, Dennis (GOV); Snyder, Rick (GOV); Baird, Richard (GOV); Gadola, Michael (GOV); Scott, Allison (GOV); Tedder, Greg (GOV)	3/4/2014	Re: CONFIDENTIAL AND SUBJECT TO ATTY CLIENT PRIVILEGE	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000968	Muchmore, Dennis	Gadola, Michael (GOV)	Snyder, Rick (GOV)	Brader, Valerie (GOV); Tedder, Greg (GOV); Muchmore, Dennis (GOV); Posthumus, Dick (GOV); Scott, Allison (GOV)	3/23/2014	Re: A heads up about the "State conditions"	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000969	Muchmore, Dennis					Proposed Structure for Income Stabilization	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000970	Muchmore, Dennis					Proposed Structure for Income Stabilization	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000971	Muchmore, Dennis	Brader, Valerie (GOV)	Gadola, Michael (GOV)	Snyder, Rick (GOV); Scott, Allison (GOV); Tedder, Greg (GOV); Muchmore, Dennis (GOV); Posthumus, Dick (GOV)	3/23/2014	Re: Conf call today	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000972	Muchmore, Dennis	Gadola, Michael (GOV) ; Muchmore, Dennis (GOV)	Brader, Valerie (GOV)		3/25/2014	Fwd: Negotiations with Don Taylor	Attorney Client Communication; Mediation	Document/email containing communication with attorney
PRIV_000973	Muchmore, Dennis	Brader, Valerie (GOV) ; Muchmore, Dennis (GOV)	Gadola, Michael (GOV)		3/25/2014	RE: Negotiations with Don Taylor	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000974	Muchmore, Dennis	Muchmore, Dennis (GOV)	Gadola, Michael (GOV)	Brader, Valerie (GOV)	3/25/2014	Re: Negotiations with Don Taylor	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000975	Muchmore, Dennis	Muchmore, Dennis (GOV)	Brader, Valerie (GOV)	Gadola, Michael (GOV)	3/25/2014	Re: Negotiations with Don Taylor	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000976	Muchmore, Dennis	Brader, Valerie (GOV)	Gadola, Michael (GOV)	Muchmore, Dennis (GOV)	3/25/2014	Re: Negotiations with Don Taylor	Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000977	Muchmore, Dennis	Snyder, Rick (GOV)	Brader, Valerie (GOV)	Muchmore, Dennis (GOV); Calley, Brian (GOV); Tedder, Greg (GOV); lukasz@paszek.com; Rustem, William (GOV); Roberts, John (GOV); Priest, Chris (GOV); Clinton, Kevin (TREASURY); Saxton, Thomas (Treasury)	12/31/2013	CONFIDENTIAL - MEDIATION- UTGO proceeds	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000978	Muchmore, Dennis					City of Detroit UTGO Debt Tranches	Mediation	Document/email discussing a subject incident to mediation

rivileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000979	Muchmore, Dennis	Snyder, Rick (GOV); Muchmore, Dennis (GOV); Roberts, John (GOV); Brader, Valerie (GOV); "lukasz@paszek.com'; Priest, Chris (GOV); Saxton, Thomas (Treasury); Rustem, William (GOV); Clinton, Kevin (TREASURY)	Tedder, Greg (GOV)	Wisniewski, Wendy (GOV) ; Scott, Allison (GOV)	1/13/2014	FW: Draft POA Slides	Attorney Client Communication; Mediation	Document/email discussing a subject incident to mediation
PRIV_000980	Muchmore, Dennis				1/14/2014	Creditor Claims treatment	Mediation	Document/email discussing a subject incident to mediation
PRIV_000981	Muchmore, Dennis	Schneider, Matthew (AG); Muchmore, Dennis (GOV)	Brader, Valerie (GOV)	Gadola, Michael (GOV)	2/13/2014	FW: Detroit: Retirement Systems' POA issue analysis	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000982	Muchmore, Dennis				Nov-13	Milliman 2013 Public Pension Funding Study	Mediation	Document/email discussing a subject incident to mediation
PRIV_000983	Muchmore, Dennis	Brader, Valerie (GOV); Schneider, Matthew (AG); Muchmore, Dennis (GOV)	Gadola, Michael (GOV)		2/13/2014	Detroit: Retirement Systems' POA issue analysis	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000984	Muchmore, Dennis	Snyder, Rick (GOV)	Brader, Valerie (GOV)	Gadola, Michael (GOV); Saxton, Thomas (Treasury); Tedder, Greg (GOV); Muchmore, Dennis (GOV); Ellison, Melanie (GOV); Scott, Allison (GOV); Clement, Elizabeth (GOV); Clinton, Kevin (TREASURY); Clinton, Kevin (TREASURY); Roberts, John (GOV); lukasz@paszek.com; Priest, Chris (GOV)	2/14/2014	FW: Detroit - Financials	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000985	Muchmore, Dennis				2/13/2014	Preliminary Draft Restructuring Scenerio (NO DWSD transaction)	Mediation	Document/email discussing a subject incident to mediation
PRIV_000986	Muchmore, Dennis	Snyder, Rick (GOV)	Gadola, Michael (GOV)	Muchmore, Dennis (GOV); Scott, Allison (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV)	2/18/2014	Update-Meeting with Judge Rosen	Attorney Client Communication; Mediation	Document/email discussing a subject incident to mediation
PRIV_000987	Muchmore, Dennis	Calley, Brian (GOV); Muchmore, Dennis (GOV)	Brader, Valerie (GOV)	Snyder, Rick (GOV); Baird, Richard (GOV); Gadola, Michael (GOV); Scott, Allison (GOV); Tedder, Greg (GOV)	3/4/2014	CONFIDENTIAL AND SUBJECT TO ATTY CLIENT PRIVILEGE	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000988	Muchmore, Dennis	R. Synder	V. Brader	Mike Gadola, Dennis Muchmore, Greg Tedder, Bill Rustem	5/3/1013	DWSD Discussions	Attorney Client Communication; Executive	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000989	Muchmore, Dennis	Buckfire, Kenneth ' <ken.buckfire@millerbuckfire.com>; Baird, Richard (GOV)</ken.buckfire@millerbuckfire.com>	Muchmore, Dennis (GOV)	Roberts, John (GOV)	10/29/2013	RE: Stories Re DWSD	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000990	Muchmore, Dennis	Snyder, Rick (GOV)	Muchmore, Dennis (GOV)		10/30/2013	FW: DWSD	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000991	Muchmore, Dennis	'Daddow, Robert' <daddowr@oakgov.com></daddowr@oakgov.com>	Muchmore, Dennis (GOV)		10/31/2013	RE: Google Alert - Detroit Water and Sewer Department, Detroit Bankruptcy	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000992	Muchmore, Dennis					Upon further review, this document should not have been included with privilege log. It is nonresponsive	Mediation	Document/email discussing a subject incident to mediation
PRIV_000993	Muchmore, Dennis	Rustem, William (GOV)	Brader, Valerie (GOV)	Muchmore, Dennis (GOV)	1/10/2014	RE: Meeting with Oakland County	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000994	Muchmore, Dennis	Buckfire, Kenneth <ken.buckfire@millerbuckfire.com>; Muchmore, Dennis (GOV)</ken.buckfire@millerbuckfire.com>	Brader, Valerie (GOV)	Van Dusen Amanda ; Wyant, Dan (DEQ) <wyantd@michigan.gov></wyantd@michigan.gov>	1/12/2014	RE: DWSD	Common Interest Agreement	Document/email containing communication with attorney

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_000995	Muchmore, Dennis	Snyder, Rick (GOV); Muchmore, Dennis (GOV); Roberts, John (GOV)	Tedder, Greg (GOV)	Scott, Allison (GOV) ; Brader, Valerie (GOV)	1/13/2014	FW: Drafts	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_000996	Muchmore, Dennis	Muchmore, Dennis (GOV)	Buckfire, Kenneth <ken.buckfire@millerbuckfire.co m></ken.buckfire@millerbuckfire.co 		1/13/2014	Fwd: DWSD Term Sheet Bodman draft January 13.DOCX	Mediation	Document/email discussing a subject incident to mediation
PRIV_000997	Muchmore, Dennis				1/13/2014	Draft Settlement Communication Term Sheet	Mediation	Document/email discussing a subject incident to mediation
PRIV_000998	Muchmore, Dennis	Orr Kevyn D.; Muchmore, Dennis (GOV); Saxton, Thomas (Treasury)	Buckfire, Kenneth <ken.buckfire@millerbuckfire.co m></ken.buckfire@millerbuckfire.co 	Brader, Valerie (GOV) ; Tedder, Greg (GOV) ; Fox stacy	1/15/2014	Fwd: DWSD PDF Redline Term Sheet Jan 15 v Jan 13.PDF;DWSD Term Sheet Bodman draft January 15.DOCX	Mediation	Document/email discussing a subject incident to mediation
PRIV_000999	Muchmore, Dennis					Attachment entitled Draft Memorandum of Understanding Comprehensive Term Sheet	Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_001000	Muchmore, Dennis			•		Attachment entitled Memorandum of Understanding Comprehensive Term Sheet	Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_001001	Muchmore, Dennis	Muchmore, Dennis (GOV); Brader, Valerie (GOV)	Buckfire, Kenneth <ken.buckfire@millerbuckfire.co m></ken.buckfire@millerbuckfire.co 		1/17/2014	I don't whether to laugh or cry	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001002	Muchmore, Dennis	Orr Kevyn D.; Muchmore, Dennis (GOV)	Buckfire, Kenneth <ken.buckfire@millerbuckfire.co m></ken.buckfire@millerbuckfire.co 	Fox stacy ; Brader, Valerie (GOV)	1/19/2014	EXECUTION COPY - DWSD MOU	Deliberative process; Mediation	Document/email discussing a subject incident to mediation; Email containing pre-decisional deliberations
PRIV_001003	Muchmore, Dennis					Attachment entitled Final Review Draft Memorandum of Understanding regarding formation of the Great Lakes Water and Sewer Authority	Deliberative process; Mediation	Document/email discussing a subject incident to mediation; Email containing pre-decisional deliberations
PRIV_001004	Muchmore, Dennis	Orr Kevyn D.; Muchmore, Dennis (GOV)	Buckfire, Kenneth <ken.buckfire@millerbuckfire.co m></ken.buckfire@millerbuckfire.co 	Fox stacy ; Brader, Valerie (GOV)	1/19/2014	EXECUTION COPY - DWSD APPENDIX to MOU	Mediation	Document/email discussing a subject incident to mediation
PRIV_001005	Muchmore, Dennis					Attachment: Appendix to Memorandum of Understanding Regarding the formation of the Great Lakes Water and Sewer Authority	Attomey Work Product; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_001006	Muchmore, Dennis					Attachment: Final review draft Appendix to Memorandum of Understanding Regarding the formation of the Great Lakes Water and Sewer Authority	Attomey Work Product; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_001007	Muchmore, Dennis	Muchmore, Dennis (GOV); Tedder, Greg (GOV); Posthumus, Dick (GOV)	Gadola, Michael (GOV)	Wisniewski, Wendy (GOV)	4/21/2014	RE: City of Detroit -Confidential Mediation Communication	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001008	Muchmore, Dennis	Scott, Allison (GOV)	Muchmore, Dennis (GOV)		10/31/2013	RE: Amended Detroit Financial Stability Agreement	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001009	Muchmore, Dennis	Scott, Allison (GOV)	Muchmore, Dennis (GOV)		12/27/2013	RE: Lukasz Paszek	Attorney Client Communication; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_001010	Muchmore, Dennis	Brader, Valerie (GOV) ; Tedder, Greg (GOV) ; Wurfel, Sara (GOV)	Muchmore, Dennis (GOV)	Roberts, John (GOV) ; Baird, Richard (GOV)	1/7/2014	RE: Media inquiry: Detroit pension freeze	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001011	Muchmore, Dennis	Saxton, Thomas (Treasury)	Muchmore, Dennis (GOV)		1/20/2014	RE: Revised Authority MOU	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
Helieged Dates Degiti	Gowlian	Linanto	Lines From	Linate Co. Linate Co. Linate Co.		RE: *Confidential: Re: DIA meeting - Notice:	The second transfer the second	Document/email discussing a subject incident to
PRIV_001012	Muchmore, Dennis	Gerald_Rosen'	Muchmore, Dennis (GOV)		1/24/2014	Confidential subject to mediation order	Mediation	mediation
PRIV_001013	Muchmore, Dennis	Snyder, Rick (GOV)	Muchmore, Dennis (GOV)	Brader, Valerie (GOV) ; Scott, Allison (GOV) ; Gadola, Michael (GOV)	1/24/2014	FW: Arts Triangle	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001014	Muchmore, Dennis	Gadola, Michael (GOV); Wurfel, Sara (GOV); Roberts, John (GOV); Tedder, Greg (GOV); Brader, Valerie (GOV)	Muchmore, Dennis (GOV)	Agen, Jarrod (GOV) ; Murray, David (GOV) ; Wisniewski, Wendy (GOV)	1/31/2014	RE: FITCH: MICHIGAN GOVERNOR'S DETROIT PROPOSAL TROUBLING FOR BONDHOLDERS	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001015	Muchmore, Dennis	Patricia Woodworth	Muchmore, Dennis (GOV)	Wisniewski, Wendy (GOV)	2/18/2014	Re: A question about funding for Detroit	Mediation	Document/email discussing a subject incident to mediation
PRIV_001016	Muchmore, Dennis	Wisniewski, Wendy (GOV)	Muchmore, Dennis (GOV)		2/18/2014	Fwd: A question about funding for Detroit	Mediation	Document/email discussing a subject incident to mediation
PRIV_001017	Muchmore, Dennis	Gadola, Michael (GOV); Brader, Valerie (GOV); Clement, Elizabeth (GOV)	Muchmore, Dennis (GOV)		3/24/2014	Fwd: Memo on bonding	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001018	Muchmore, Dennis	Tedder, Greg (GOV) ; Gadola, Michael (GOV) ; Posthumus, Dick (GOV)	Muchmore, Dennis (GOV)	Wisniewski, Wendy (GOV)	4/21/2014	RE: City of Detroit -Confidential Mediation Communication	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001019	Muchmore, Dennis	Gadola, Michael (GOV); Posthumus, Dick (GOV); Baird, Richard (GOV); Tedder, Greg (GOV); Brader, Valerie (GOV)	Muchmore, Dennis (GOV)		4/21/2014	RE: City of Detroit - Confidential Mediation Communication	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001020	Muchmore, Dennis	Gadola, Michael (GOV)	Brader, Valerie (GOV)	lukasz@paszek.com; Muchmore, Dennis (GOV) ; Tedder, Greg (GOV)	1/14/2014	Value of settlement	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001021	Muchmore, Dennis	Brader, Valerie (GOV)	Snyder, Rick (GOV)	Scott, Allison (GOV); Muchmore, Dennis (GOV); Gadola, Michael (GOV); Tedder, Greg (GOV); Roberts, John (GOV)	1/19/2014	Re: Detroit Settlement Conditions Draft	Attorney Client Communication; Attorney Work Product; Executive; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001022	Muchmore, Dennis				1/19/2014	Attachment: Detroit Settlement Conditions Draft Analysis	Attorney Client Communication; Mediation	Document/email discussing a subject incident to mediation
PRIV_001023	Muchmore, Dennis	Brader, Valerie (GOV)	Snyder, Rick (GOV)	Scott, Allison (GOV); Muchmore, Dennis (GOV); Gadola, Michael (GOV); Tedder, Greg (GOV); Roberts, John (GOV)	1/19/2014	Re: Detroit Revised Conditions Draft	Attomey Client Communication; Executive; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001024	Muchmore, Dennis				1/19/2014	Attachment: Detroit Revised Conditions Draft	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001025	Muchmore, Dennis	Snyder, Rick (GOV)	Gadola, Michael (GOV)	Brader, Valerie (GOV); Scott, Allison (GOV); Muchmore, Dennis (GOV); Tedder, Greg (GOV); Roberts, John (GOV)	1/19/2014	Re: Revised Draft Conditions	Attorney Client Communication; Executive; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001026	Muchmore, Dennis	Gadola, Michael (GOV)	Snyder, Rick (GOV)	Brader, Valerie (GOV); Scott, Allison (GOV); Muchmore, Dennis (GOV); Tedder, Greg (GOV); Roberts, John (GOV)	1/19/2014	Re: Revised Draft Conditions	Attorney Client Communication; Attorney Work Product; Executive; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001027	Muchmore, Dennis	Snyder, Rick (GOV)	Gadola, Michael (GOV)	Brader, Valerie (GOV); Scott, Allison (GOV); Muchmore, Dennis (GOV); Tedder, Greg (GOV); Roberts, John (GOV)	1/20/2014	Re: Revised Draft Conditions	Attorney Client Communication; Executive; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001028	Muchmore, Dennis	Gadola, Michael (GOV)	Snyder, Rick (GOV)	Brader, Valerie (GOV); Scott, Allison (GOV); Muchmore, Dennis (GOV); Tedder, Greg (GOV); Roberts, John (GOV)	1/20/2014	Re: Detroit Settlement	Attorney Client Communication; Executive; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001029	Muchmore, Dennis	Gadola, Michael (GOV)	Snyder, Rick (GOV)	Brader, Valerie (GOV); Muchmore, Dennis (GOV); Roberts, John (GOV); Scott, Allison (GOV)	1/20/2014	Re: Detroit Mediation Settlement Terms; Notice: Confidential - mediation related	Mediation	Document/email discussing a subject incident to mediation

tvileged Bates Begin	Custodian	Email To	Email From	Émail CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_001030	Muchmore, Dennis				1/19/2014	Detroit Settlement Conditions Draft Analysis	Mediation	Document/email discussing a subject incident to mediation
PRIV_001031	Muchmore, Dennis	Gerald_Rosen'	Snyder, Rick (GOV)	Brader, Valerie (GOV); Gadola, Michael (GOV); Tedder, Greg (GOV); Scott, Allison (GOV); Posthumus, Dick (GOV); Agen, Jarrod (GOV); Muchmore, Dennis (GOV); Roberts, John (GOV)	1/21/2014	Draft Settlement Conditions; Notice: Confidential subject to Mediation Order	Attorney Client Communication; Executive; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001032	Muchmore, Dennis				1/21/2014	Detroit Settlement Conditions Draft Analysis v2	Mediation	Document/email discussing a subject incident to mediation
PRIV_001033	Muchmore, Dennis	Jase Bolger	Snyder, Rick (GOV)	Muchmore, Dennis (GOV); Norm Saari; Brock Swartzle; Brader, Valerie (GOV); Gadola, Michael (GOV)	1/28/2014	Re: Detroit Pension Settlement - Notice - Confidential subject to Mediation Order	Mediation	Document/email discussing a subject incident to mediation
PRIV_001034	Muchmore, Dennis	Brader, Valerie (GOV) ; Gadola, Michael (GOV)	Snyder, Rick (GOV)	Muchmore, Dennis (GOV)	2/5/2014	Fwd: Recap on UTGOs	Mediation	Document/email discussing a subject incident to mediation
PRIV_001035	Muchmore, Dennis					PDF: Judge Perris' View	Mediation	Document/email discussing a subject incident to mediation
PRIV_001036	Muchmore, Dennis					PDF: Why will there be a ripple effect in Michigan	Mediation	Document/email discussing a subject incident to mediation
PRIV_001037	Muchmore, Dennis	Gerald Rosen	Blackstone Advisory Partners		2/14/2014	ULTGO bonds	Mediation	Document/email discussing a subject incident to mediation
PRIV_001038	Muchmore, Dennis	Snyder, Rick (GOV) ; Gadola, Michael (GOV)	Brader, Valerie (GOV)	Muchmore, Dennis (GOV)	2/5/2014	RE: Recap on UTGOs	Attorney Client Communication; Mediation	Document/email discussing a subject incident to mediation
PRIV_001039	Muchmore, Dennis	Brader, Valerie (GOV)	Gadola, Michael (GOV)	Snyder, Rick (GOV) ; Muchmore, Dennis (GOV)	2/5/2014	Re: Recap on UTGOs	Attorney Client Communication; Mediation	Document/email discussing a subject incident to mediation
PRIV_001040	Muchmore, Dennis	Jase Bolger; Snyder, Rick (GOV)	Muchmore, Dennis (GOV)	Norm Saari ; Brock Swartzle ; Gadola, Michael (GOV)	1/27/2014	Re: Detroit Pension Settlement - Notice - Confidential subject to Mediation Order	Mediation	Document/email discussing a subject incident to mediation
PRIV_001041	Muchmore, Dennis	Gadola, Michael (GOV)	Muchmore, Dennis (GOV)		1/27/2014	Re: Detroit Pension Settlement - Notice - Confidential subject to Mediation Order	Mediation	Document/email discussing a subject incident to mediation
PRIV_001042	Muchmore, Dennis	Muchmore, Dennis (GOV) ; Posthumus, Dick (GOV)	Thomas Stallworth	Durfee, Sally (GOV)	1/27/2014	Follow Up on Detroit Pension Settlement	Mediation	Document/email discussing a subject incident to mediation
PRIV_001043	Muchmore, Dennis	Snyder, Rick (GOV)	Jase Bolger	Muchmore, Dennis (GOV) ; Norm Saari ; Brock Swartzle	1/27/2014	Fwd: Detroit Pension Settlement - Notice - Confidential subject to Mediation Order	Mediation	Document/email discussing a subject incident to mediation
PRIV_001044	Muchmore, Dennis	Muchmore, Dennis (GOV)	Gadola, Michael (GOV)		1/27/2014	RE: Detroit Pension Settlement - Notice - Confidential subject to Mediation Order	Mediation	Document/email discussing a subject incident to mediation
PRIV_001045	Muchmore, Dennis	Muchmore, Dennis (GOV)	Gadola, Michael (GOV)		1/27/2014	RE: Detroit Pension Settlement - Notice - Confidential subject to Mediation Order	Mediation	Document/email discussing a subject incident to mediation
PRIV_001046	Muchmore, Dennis	Brader, Valerie (GOV); Tedder, Greg (GOV)	Posthumus, Dick (GOV)	Durfee, Sally (GOV) ; Muchmore, Dennis (GOV)	1/27/2014	RE: Follow Up on Detroit Pension Settlement	Mediation	Document/email discussing a subject incident to mediation
PRIV_001047	Muchmore, Dennis	Gerald E. Rosen	Snyder, Rick (GOV)	Brader, Valerie (GOV) ; Muchmore, Dennis (GOV)	1/27/2014	Fwd: Detroit Pension Settlement - Notice - Confidential subject to Mediation Order	Mediation	Document/email discussing a subject incident to mediation
PRIV_001048	Muchmore, Dennis	Muchmore, Dennis (GOV)	Snyder, Rick (GOV)	Jase Bolger; Norm Saari; Brock Swartzle; Gadola, Michael (GOV); Brader, Valerie (GOV)	1/27/2014	Re: Detroit Pension Settlement - Notice - Confidential subject to Mediation Order	Mediation	Document/email discussing a subject incident to mediation
PRIV_001049	Pleyte, Beth	Pleyte, Beth (Treasury)	Saxton, Thomas (Treasury)		1/13/2014	FW: Draft POA Slides	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_001050	Pleyte, Beth	Pleyte, Beth (Treasury)	Saxton, Thomas (Treasury)		1/13/2014	FW: CONFIDENTIAL, SUBJECT TO MEDIATION ORDER AND COMMON INTEREST AGREEMENT	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001051	Pleyte, Beth	Gelisse, Ashley (TREASURY); Saxton, Thomas (Treasury)	Lamphier, Wendy (Treasury)	Cousineau, Sara (Treasury) ; Pleyte, Beth (Treasury)	2/18/2014	FW: City of Detroit Pension Plan Actuarial Reports	Mediation	Document/email discussing a subject incident to mediation
PRIV_001052	Pleyte, Beth				6/30/2013	Attachment: Financial Report with Supplemental Information for Detroit Pension Plan	Mediation	Document/email discussing a subject incident to mediation
PRIV_001053	Pleyte, Beth				6/30/2013	Attachment: Financial Report with Supplemental Information for Detroit Pension Plan	Mediation	Document/email discussing a subject incident to mediation

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_001054	Pleyte, Beth	Saxton, Thomas (Treasury) ; Headen, Frederick (Treasury)	MIStateTreasurer	Pleyte, Beth (Treasury) ; Lamphier, Wendy (Treasury)	2/24/2014	FW: In re City of Detroit, Michigan, Case No. 13- 53846 - KCC on Behalf of Debtor - Plan and Disclosure Statement	Mediation	Document/email discussing a subject incident to mediation
PRIV_001055	Pleyte, Beth	Saxton, Thomas (Treasury) ; Headen, Frederick (Treasury)	MIStateTreasurer	Pleyte, Beth (Treasury) ; Lamphier, Wendy (Treasury)	2/24/2014	FW: In re City of Detroit, Michigan, Case No. 13- 53846 - KCC on Behalf of Debtor - Motions re Plan and Disclosure Statement	Mediation	Document/email discussing a subject incident to mediation
PRIV_001056	Pleyte, Beth	Saxton, Thomas (Treasury); Headen, Frederick (Treasury)	MIStateTreasurer	Pleyte, Beth (Treasury) ; Lamphier, Wendy (Treasury)	2/26/2014	FW: In re City of Detroit, Michigan, Case No. 13- 53846 - KCC on Behalf of Debtor - Orders	Mediation	Document/email discussing a subject incident to mediation
PRIV_001057	Pleyte, Beth	Saxton, Thomas (Treasury); Headen, Frederick (Treasury)	MIStateTreasurer	Pleyte, Beth (Treasury) ; Lamphier, Wendy (Treasury)	3/4/2014	FW: In re City of Detroit, Michigan, Case No. 13- 53846 - KCC on Behalf of Debtor - Response and Motions	Mediation	Document/email discussing a subject incident to mediation
PRIV_001058	Pleyte, Beth	West, Samantha (GOV)	Gelisse, Ashley (TREASURY)	Pleyte, Beth (Treasury)	3/10/2014	FW: Call to discuss hybrid plans and negotiations – Confidential Communication	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_001059	Pleyte, Beth	Gelisse, Ashley (TREASURY) ; Tedder, Greg (GOV)	West, Samantha (GOV)	Pleyte, Beth (Treasury) ; VanSickle, Michele (GOV)	3/10/2014	RE: Call to discuss hybrid plans and negotiations – Confidential Communication	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_001060	Pleyte, Beth	West, Samantha (GOV) ; Tedder, Greg (GOV)	Gelisse, Ashley (TREASURY)	Pleyte, Beth (Treasury) ; VanSickle, Michele (GOV)	3/10/2014	RE: Call to discuss hybrid plans and negotiations – Confidential Communication	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001061	Pleyte, Beth	Gelisse, Ashley (TREASURY); West, Samantha (GOV); Tedder, Greg (GOV)	VanSickle, Michele (GOV)	Pleyte, Beth (Treasury)	3/10/2014	RE: Call to discuss hybrid plans and negotiations – Confidential Communication	Common Interest Agreement; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_001062	Pleyte, Beth	Pleyte, Beth (Treasury); VanSickle, Michele (GOV); Gelisse, Ashley (TREASURY); Tedder, Greg (GOV)	West, Samantha (GOV)		3/10/2014	RE: Call to discuss hybrid plans and negotiations – Confidential Communication	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001063	Pleyte, Beth	Saxton, Thomas (Treasury); Headen, Frederick (Treasury)	MIStateTreasurer	Pleyte, Beth (Treasury) ; Lamphier, Wendy (Treasury)	3/11/2014	FW: In re City of Detroit, Michigan, Case No. 13- 53846 - KCC on Behalf of Debtor - Notice of Amended Proposed Order	Mediation	Document/email discussing a subject incident to mediation
PRIV_001064	Pleyte, Beth	Cousineau, Sara (Treasury) ; Pleyte, Beth (Treasury)	Saxton, Thomas (Treasury)		3/25/2014	FW: CONFIDENTIAL AND SUBJECT TO MEDIATION ORDER	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001065	Pleyte, Beth	Saxton, Thomas (Treasury)	West, Samantha (GOV)	Pleyte, Beth (Treasury) ; Gadola, Michael (GOV) ; Tedder, Greg (GOV)	3/26/2014	RE: CONFIDENTIAL AND SUBJECT TO MEDIATION ORDER	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001066	Pleyte, Beth	West, Samantha (GOV)	Saxton, Thomas (Treasury)	Pleyte, Beth (Treasury); Gadola, Michael (GOV); Tedder, Greg (GOV)	3/26/2014	RE: CONFIDENTIAL AND SUBJECT TO MEDIATION ORDER	Common Interest Agreement; Mediation	
PRIV_001067	Pleyte, Beth	Pamela Steffy (psteffy@mersofmich.com); CDeRose@mersofmich.com; Monticello, Frank (AG); Schneider, Matthew (AG); Schneider, Matthew (AG); Gustafson, Holly (AG); Saxton, Thomas (Treasury); Doyle, Maureen (Treasury); Clinton, Kevin (TREASURY); Pleyte, Beth (Treasury); Herbach, Michael (DTMB); Stoddard, Phil (DTMB); Flancher, Steven (AG); Vanden Bosch, Kerrie (DTMB)	West, Samantha (GOV) - on behalf of - Brader, Valerie (GOV)		4/8/2014	Confidential: Attorney-Client Privilege: Conference Call	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation

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PRIV_001068	Pleyte, Beth				1.4.4	Attachment: GRS Hybrid Plan - Material Terms	Attorney Work Product; Mediation	Document/email containing attorney work product Document/email discussing a subject incident to mediation
PRIV_001069	Pleyte, Beth	VanSickle, Michele (GOV); Gelisse, Ashley (TREASURY); West, Samantha (GOV); Tedder, Greg (GOV)	Pleyte, Beth (Treasury)		3/10/2014	RE: Call to discuss hybrid plans and negotiations – Confidential Communication	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001070	Pleyte, Beth	West, Samantha (GOV); Clinton, Kevin (TREASURY); Saxton, Thomas (Treasury); Doyle, Maureen (Treasury)	Pleyte, Beth (Treasury)		4/8/2014	RE: Confidential: Attomey-Client Privilege	Mediation	Document/email discussing a subject incident to mediation
PRIV_001071	Posthumus, Dick	Steven G. Howell ; Gadola, Michael (GOV); Schneider, Matthew (AG); Nelson, Margaret (AG); Flancher, Steven (AG); Peter H. Ellsworth; Kester K. So; Posthumus, Dick (GOV)	Brader, Valerie (GOV)	Dawn R. Copley	10/4/2013	Additional Mediation Statement	Attomey Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001072	Posthumus, Dick				10/7/2013	State of Michigan's Confidential Mediation Statement	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001073	Posthumus, Dick	Brader, Valerie (GOV)	Schneider, Matthew (AG)	Gadola, Michael (GOV); Steven G. Howell; Nelson, Margaret (AG); Flancher, Steven (AG); Peter H. Ellsworth; Kester K. So; Posthumus, Dick (GOV); Dawn R. Copley; Gustafson, Holly (AG)	10/7/2013	RE: Additional Mediation Statement	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001074	Posthumus, Dick				10/7/2014	Attachment: State of Michigan's Confidential Mediation Statement	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001075	Posthumus, Dick	Schneider, Matthew (AG)	Brader, Valerie (GOV)	Gadola, Michael (GOV); Steven G. Howell; Nelson, Margaret (AG); Flancher, Steven (AG); Peter H. Ellsworth; Kester K. So; Posthumus, Dick (GOV); Dawn R. Copley; Gustafson, Holly (AG)	10/7/2013	Re: Additional Mediation Statement	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001076	Posthumus, Dick	Schneider, Matthew (AG)	Brader, Valerie (GOV)	Gadola, Michael (GOV); Steven G. Howell; Nelson, Margaret (AG); Flancher, Steven (AG); Peter H. Ellsworth; Kester K. So; Posthumus, Dick (GOV); Dawn R. Copley; Gustafson, Holly (AG)	10/7/2013 ~	Re: Additional Mediation Statement	Attorney Client Communication; Attorney Work Product; Deliberative process; Executive; Mediation	Document/email containing attorney work product Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001077	Posthumus, Dick	Brader, Valene (GOV); Schneider, Matthew (AG)	Steven G. Howell	Gadola, Michael (GOV); Nelson, Margaret (AG); Flancher, Steven (AG); Peter H. Ellsworth; Kester K. So; Posthumus, Dick (GOV); Dawn R. Copley; Gustafson, Holly (AG)	10/7/2013	RE: Additional Mediation Statement	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing attorney work product Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001078	Posthumus, Dick	Brader, Valerie (GOV); Schneider, Matthew (AG)	Gadola, Michael (GOV)	Steven G. Howell ; Nelson, Margaret (AG) ; Flancher, Steven (AG) ; Peter H. Ellsworth ; Kester K. So ; Posthumus, Dick (GOV) ; Dawn R. Copley ; Gustafson, Holly (AG)	10/7/2013	RE: Additional Mediation Statement	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing attorney work product Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001079	Posthumus, Dick	Schneider, Matthew (AG) ; Brader, Valerie (GOV)	Gadola, Michael (GOV)	Steven G. Howell; Nelson, Margaret (AG); Flancher, Steven (AG); Peter H. Ellsworth; Kester K. So; Posthumus, Dick (GOV); Dawn R. Copley; Gustafson, Holly (AG)	10/7/2013	RE: Additional Mediation Statement	Attorney Client Communication; Attorney Work Product; Mediation	Document/email containing attorney work product Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001080	Posthumus, Dick	Brader, Valerie (GOV)	Gadola, Michael (GOV)	Snyder, Rick (GOV); Muchmore, Dennis (GOV); Roberts, John (GOV); Posthumus, Dick (GOV); Tedder, Greg (GOV); Scott, Allison (GOV)	12/27/2013	Re: MediationConfidential attomey-client communication and subject to non-disclosure under federal court mediation order/rules	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation

Privileged Bates Begin	Custodian	Email To	Email From	Emell CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_001081	Posthumus, Dick	Posthumus, Dick (GOV)	Brader, Valerie (GOV)	Nixon, John (DTMB) <nixonj@michigan.gov></nixonj@michigan.gov>	1/9/2014	Re: Detroit settlement	Mediation	Document/email discussing a subject incident to mediation
PRIV_001082	Posthumus, Dick	Posthumus, Dick (GOV)	Sam Moore <sam@sam- moore.com></sam@sam- 		1/17/2014	Detroit	Mediation	Document/email discussing a subject incident to mediation
PRIV_001083	Posthumus, Dick	Brader, Valerie (GOV); Snyder, Rick (GOV); Orr Kevyn D.	Muchmore, Dennis (GOV)	Posthumus, Dick (GOV); Durfee, Sally (GOV); Ackerman, Darin (GOV); Tedder, Greg (GOV); Scott, Allison (GOV)	2/4/2014	RE: Michigan AFSCME on Governor Snyder's Proposal - City of Detroit	Mediation	Document/email discussing a subject incident to mediation
PRIV_001084	Posthumus, Dick	Posthumus, Dick (GOV)	Ackerman, Darin (GOV)		2/4/2014	Fwd: Detroit	Mediation	Document/email discussing a subject incident to mediation
PRIV_001085	Posthumus, Dick	Snyder, Rick (GOV)	Brader, Valerie (GOV)	Gadola, Michael (GOV); Holyfield, Jeff (GOV); Mcbride, Bill (GOV); Muchmore, Dennis (GOV); Posthumus, Dick (GOV); Roberts, John (GOV); Rustern, William (GOV); Ackerman, Darin (GOV); Brown, Eric (GOV); Durfee, Sally (GOV); Brownfield, Michael (GOV); Tomich, Zak (GOV); Wurfel, Sara (GOV)	8/2/2013	Pension policy changes options memo	Attorney Client Communication; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_001086	Posthumus, Dick	Muchmore, Dennis (GOV); Gadola, Michael (GOV); Baird, Richard (GOV); Tedder, Greg (GOV); Brader, Valerie (GOV)	Posthumus, Dick (GOV)		4/21/2014	RE: City of Detroit - Confidential Mediation Communication	Mediation	Document/email discussing a subject incident to mediation
PRIV_001087	Posthumus, Dick	Brader, Valerie (GOV)	Schneider, Matthew (AG)	Gadola, Michael (GOV); Steven G. Howell; Nelson, Margaret (AG); Flancher, Steven (AG); Peter H. Ellsworth; Kester K. So; Posthumus, Dick (GOV); Dawn R. Copley; Gustafson, Holly (AG)	10/7/2013	RE: Additional Mediation Statement	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001088	Posthumus, Dick						Mediation	Document/email discussing a subject incident to mediation
PRIV_001089	Posthumus, Dick	'Norm Saari' <nsaari063@icloud.com></nsaari063@icloud.com>	Brader, Valerie (GOV)	Laura DuBreuil ; Posthumus, Dick (GOV)	12/18/2013	RE: Speaker Mtg with Judge Rosen	Mediation	Document/email discussing a subject incident to mediation
PRIV_001090	Posthumus, Dick						Mediation	Document/email discussing a subject incident to mediation
PRIV_001091	Posthumus, Dick	Posthumus, Dick (GOV); Durfee, Sally (GOV); Ackerman, Darin (GOV)	Brader, Valerie (GOV)		1/28/2014	FW: Detroit Pension Settlement - Notice - Confidential subject to Mediation Order	Mediation	Document/email discussing a subject incident to mediation
PRIV_001092	Posthumus, Dick	snyderr11@michigan.gov	Posthumus, Dick (GOV)	Emmitt, Beth (GOV); Scott, Allison (GOV); Brader, Valerie (GOV)	12/16/2013	Meeting with Leaders	Executive; Mediation	Document/email discussing a subject incident to mediation
PRIV_001093	Posthumus, Dick	Ackerman, Darin (GOV); Durfee, Sally (GOV)	Posthumus, Dick (GOV)		12/16/2013	FW: Meeting with Leaders	Executive; Mediation	Document/email discussing a subject incident to mediation
PRIV_001094	Posthumus, Dick	Snyder, Rick (GOV)	Posthumus, Dick (GOV)	Emmitt, Beth (GOV); Scott, Allison (GOV); Ackerman, Darin (GOV); Durfee, Sally (GOV)	12/16/2013	RE: Meeting with Leaders	Executive; Mediation	Document/email discussing a subject incident to mediation
PRIV_001095	Posthumus, Dick	Brader, Valerie (GOV)	Posthumus, Dick (GOV)		12/19/2013	RE: Detroit Bankruptcy mediation information	Mediation	Document/email discussing a subject incident to mediation
PRIV_001096	Posthumus, Dick	Nixon, John (DTMB) Brader, Valerie (GOV)	Posthumus, Dick (GOV)		1/9/2014	Detroit settlement	Mediation	Document/email discussing a subject incident to mediation
PRIV_001097	Posthumus, Dick				1/9/2014	Memo to All legislators re: Detroit Bankruptcy	Mediation	Document/email discussing a subject incident to mediation
PRIV_001098	Posthumus, Dick	'annivorycalvert@comcast.net'	Posthumus, Dick (GOV)	Ackerman, Darin (GOV); Muchmore, Dennis (GOV)	1/23/2014	FW: Detroit Bankruptcy	Mediation	Document/email discussing a subject incident to mediation
PRIV_001099	Posthumus, Dick	Ackerman, Darin (GOV); Muchmore, Dennis (GOV)	Posthumus, Dick (GOV)	Durfee, Sally (GOV)	1/23/2014	RE: \$350 million committment	Mediation	Document/email discussing a subject incident to mediation
PRIV_001100	Posthumus, Dick	Durfee, Sally (GOV) ; Ackerman, Darin (GOV)	Posthumus, Dick (GOV)		2/3/2014	FW: Draft bill-CONFIDENTIAL-SUBJECT TO BANKRUPTCY COURT MEDIATION ORDER	Mediation	Document/email discussing a subject incident to mediation
PRIV_001101	Posthumus, Dick	Muchmore, Dennis (GOV); Orr Kevyn D.; Snyder, Rick (GOV)	Posthumus, Dick (GOV)	Durfee, Sally (GOV); Brader, Valerie (GOV); Ackerman, Darin (GOV); Tedder, Greg (GOV); Scott, Allison (GOV)	2/4/2014	RE: Michigan AFSCME on Governor Snyder's Proposal - City of Detroit	Common Interest Agreement; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation

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PRIV_001102	Posthumus, Dick	Rospond, Laurie (GOV)	Posthumus, Dick (GOV)		2/4/2014	FW: Michigan AFSCME on Governor Snyder's Proposal - City of Detroit	Mediation	Document/email discussing a subject incident to mediation
PRIV_001103	Posthumus, Dick	Snyder, Rick (GOV) ; Muchmore, Dennis (GOV)	Posthumus, Dick (GOV)	Brader, Valerie (GOV); Orr Kevyn D.; Durfee, Sally (GOV); Ackerman, Darin (GOV); Tedder, Greg (GOV); Scott, Allison (GOV); Rospond, Laurie (GOV)	2/4/2014	RE: Michigan AFSCME on Governor Snyder's Proposal - City of Detroit	Executive; Mediation	Document/email discussing a subject incident to mediation
PRIV_001104	Posthumus, Dick	Gadola, Michael (GOV) ; Muchmore, Dennis (GOV)	Posthumus, Dick (GOV)		2/24/2014	RE: Detroit Bankruptcy and Leaders	Attorney Client Communication; Executive; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001105	Posthumus, Dick	Gadola, Michael (GOV)	Posthumus, Dick (GOV)		3/21/2014	Re: State conditions	Attorney Client Communication; Executive; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001106	Posthumus, Dick	Brader, Valerie (GOV); Snyder, Rick (GOV)	Posthumus, Dick (GOV)	Gadola, Michael (GOV); Tedder, Greg (GOV); Muchmore, Dennis (GOV); Scott, Allison (GOV)	3/25/2014	RE: additional scenario information	Attorney Client Communication; Attorney Work Product; Deliberative process; Executive; Mediation	Document/email discussing a subject incident to mediation
PRIV_001107	Posthumus, Dick	Muchmore, Dennis (GOV); Ackerman, Darin (GOV); Durfee, Sally (GOV); Brader, Valerie (GOV); Gadola, Michael (GOV); Clement, Elizabeth (GOV); Roberts, John (DTMB)	Posthumus, Dick (GOV)	Snyder, Rick (GOV)	4/15/2014	Legislative letter	Executive; Mediation	Document/email discussing a subject incident to mediation
PRIV_001108	Posthumus, Dick	Muchmore, Dennis (GOV); Ackerman, Darin (GOV); Durfee, Sally (GOV); Brader, Valerie (GOV); Gadola, Michael (GOV); Clement, Elizabeth (GOV); Roberts, John (DTMB)	Posthumus, Dick (GOV)	Snyder, Rick (GOV)	4/15/2014	FW: Legislative letter	Attorney Client Communication; Deliberative process; Executive; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001109	Posthumus, Dick	Muchmore, Dennis (GOV); Wurfel, Sara (GOV); Tedder, Greg (GOV); Brader, Valerie (GOV); Gadola, Michael (GOV); Ackerman, Darin (GOV); Durfee, Sally (GOV)	Posthumus, Dick (GOV)		4/17/2014	RE: Detroit bankruptcy "grand bargain"	Executive; Mediation	Document/email discussing a subject incident to mediation
PRIV_001110	Posthumus, Dick	Posthumus, Dick (GOV)	Brader, Valerie (GOV)		1/27/2014	Fwd: Detroit Pension Settlement - Notice - Confidential subject to Mediation Order	Mediation	Document/email discussing a subject incident to mediation
PRIV_001111	Saxton, Thomas	Saxton, Thomas (Treasury)	Brader, Valerie (GOV)	Tedder, Greg (GOV)	12/10/2013	CONFIDENTIAL - Subject to mediation order	Attomey Client Communication; Common Interest Agreement; Mediation	Document/email containing attorney work production become nt/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001112	Saxton, Thomas	Saxton, Thomas (Treasury)	Stibitz, Brom (Treasury) >		12/30/2013	FW: updated status for call tomorrow at 10 a.m. re Detroit/Mediation	Mediation	Document/email discussing a subject incident to mediation
PRIV_001113	Saxton, Thomas	Tedder, Greg (GOV); Rustem, William (GOV); Saxton, Thomas (Treasury)	Brader, Valerie (GOV)		1/7/2014	CONFIDENTIAL AND SUBJECT TO MEDIATION.	Mediation	Document/email discussing a subject incident to mediation
PRIV_001114	Saxton, Thomas	Evan Miller	Suzanne Taranto		6/29/2013	For mediation acturial values	Attorney Client Communication; Common Interest Agreement	Document/email containing communication with attorney
PRIV_001115	Saxton, Thomas					PDF Attachment City of Detroit Baseline Plan EPBO and Expected Payments	Attorney Client Communication; Common Interest Agreement	Document/email containing communication with attorney
PRIV_001116	Saxton, Thomas					PDF Attachment City of Detroit Baseline Plan Projected Active Headcount and Expected Payments	Attorney Client Communication; Common Interest Agreement	Document/email containing communication with attorney
PRIV_001117	Saxton, Thomas	Evan Miller	Suzanne Taranto		1/23/2014	For mediation acturial valuations and plan design study DWSD	Attorney Client Communication; Common Interest Agreement	Document/email containing communication with attorney

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Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject Subject	Privilege Type	Privilege Descriptions
PRIV_001118	Saxton, Thomas	 				Attachment Supplemental Agreement PDF: Confidential Draft Summary of Proposal		Document/email discussing a subject incident to
PRIV_001119	Saxton, Thomas					Responses for Purposes of Discussion	Mediation	mediation
PRIV_001120	Saxton, Thomas	Murphy, Michael (AG)	Saxton, Thomas (Treasury)	Monticello, Frank (AG); Nelson, Margaret (AG); Robert, Carla M. (Treasury); MacDowell, Mary G. (Treasury)	3/6/2012	RE: AFSCME v Dillon, et al Resolution	Attorney Client Communication	Document/email containing communication with attorney
PRIV_001121	Saxton, Thomas					PDF: Draft DWSD 10 year business plan	Common Interest Agreement	Document/email containing attorney work product
PRIV_001122	Saxton, Thomas	Pleyte, Beth (Treasury)	Saxton, Thomas (Treasury)	·	12/11/2013	FW: CONFIDENTIAL - Subject to mediation order	Mediation	Document/email discussing a subject incident to mediation
PRIV_001123	Saxton, Thomas	Clinton, Kevin (TREASURY)	Saxton, Thomas (Treasury)		12/20/2013	FW: CONFIDENTIAL – subject to mediation order	Mediation	Document/email discussing a subject incident to mediation
PRIV_001124	Saxton, Thomas					Attachment: City of Detroit Proposal for Creditors	Mediation	Document/email discussing a subject incident to mediation
PRIV_001125	Saxton, Thomas	Pleyte, Beth (Treasury)	Saxton, Thomas (Treasury)		1/13/2014	FW: Draft POA Slides	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001126	Saxton, Thomas	Pleyte, Beth (Treasury)	Saxton, Thomas (Treasury)		1/13/2014	FW: CONFIDENTIAL, SUBJECT TO MEDIATION ORDER AND COMMON INTEREST AGREEMENT	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Deliberative process; Mediation	Document/email containing attorney work product; Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001127	Saxton, Thomas	Sue McCormick <mccormick@dwsd.org></mccormick@dwsd.org>	Saxton, Thomas (Treasury)	Brader, Valerie (GOV); Pleyte, Beth (Treasury); Nicolette Bateson bateson@dwsd.org ; Creal, William (DEQ)	1/21/2014	RE: DWSD	Mediation	
PRIV_001128	Saxton, Thomas	Creal, William (DEQ)	Saxton, Thomas (Treasury)		1/21/2014	Re: DWSD	Mediation	Document/email discussing a subject incident to mediation
PRIV_001129	Saxton, Thomas					PDF: City of Detroit \$350,000,000 Post Petition Loan Key Terms & Conditions	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001130	Saxton, Thomas	Brader, Valerie (GOV) ; Rustem, William (GOV)	Saxton, Thomas (Treasury)	Tedder, Greg (GOV)	2/5/2014	RE: Marketing Process for DWSD	Attorney Client Communication; Common Interest Agreement	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_001131	Saxton, Thomas	Kester K. So	Saxton, Thomas (Treasury)		2/12/2014	FW: Resending	Attorney Client Communication; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_001132	Saxton, Thomas	Brader, Valerie (GOV)	Saxton, Thomas (Treasury)	Tedder, Greg (GOV)	2/18/2014	FW: DWSD bond treatment	Mediation	Document/email discussing a subject incident to mediation
PRIV_001133	Saxton, Thomas					Attachment: Draft Detroit SRF Loans spreadsheet	Mediation	Document/email discussing a subject incident to mediation
PRIV_001134	Saxton, Thomas	Fillingham, Ann <afillingham@dykema.com>; Barton, John (Treasury)</afillingham@dykema.com>	Saxton, Thomas (Treasury)		2/19/2014	FW: DWSD bond treatment	Mediation	Document/email discussing a subject incident to mediation
PRIV_001135	Saxton, Thomas	Fillingham, Ann <afillingham@dykema.com></afillingham@dykema.com>	Saxton, Thomas (Treasury)	Barton, John (Treasury); Pleyte, Beth (Treasury)	2/20/2014	RE: DWSD bond treatment	Mediation	Document/email discussing a subject incident to mediation
PRIV_001136	Saxton, Thomas	Lee Donner <lee.donner@firstsw.com>; Barton, John (Treasury)</lee.donner@firstsw.com>	Saxton, Thomas (Treasury)	Anne Burger Entrekin <anne.burgerentrekin@firstsw.com>; Ann Fillingham <afillingham@dykema.com></afillingham@dykema.com></anne.burgerentrekin@firstsw.com>	2/24/2014	RE: dwsd	Mediation	Document/email discussing a subject incident to mediation
PRIV_001137	Saxton, Thomas	Kevyn Orr ; Stacy Fox	Saxton, Thomas (Treasury)	Tedder, Greg (GOV) ; Brader, Valerie (GOV) ; Rustem, William (GOV)	2/28/2014	RE: Follow-up to our meeting this morning - DWSD contemplated bond sale - First Southwest.	Mediation	Document/email discussing a subject incident to mediation
PRIV_001138	Saxton, Thomas	Whitehouse, T J <pre><hc></hc></pre> <pre><thomas.j.whitehouse@jpmorgan.< pre=""></thomas.j.whitehouse@jpmorgan.<></pre>	Saxton, Thomas (Treasury)	Kester So (kso@dickinsonwright.com)	3/19/2014	RE: language, revised	Mediation	Document/email discussing a subject incident to mediation
PRIV_001139	Saxton, Thomas	Workman, Wayne (TREASURY)	Saxton, Thomas (Treasury)		3/26/2014	FW: CONFIDENTIAL AND SUBJECT TO MEDIATION ORDER UTGO settlement	Mediation	Document/email discussing a subject incident to mediation

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Privileged Bates Begin	Custodian	Email 10	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_001140	Saxton, Thomas	Kester K. So	Saxton, Thomas (Treasury)		3/28/2014	FW: #22035825v3 <active> - Detroit - City Revised Draft UTGO Term Sheet 3/25- #22035825v4<active> - Detroit - City Revised Draft UTGO Term Sheet 3/25</active></active>	Mediation	Document/email discussing a subject incident to mediation
PRIV_001141	Snyder, Rick					Attachment: Cities Spreadsheet	Deliberative process; Executive	Email containing pre-decisional deliberations
PRIV_001142	Snyder, Rick					PDF: Memorandum of Understanding City of Reform Program	Deliberative process	
PRIV_001143	Snyder, Rick		•			PDF: Memorandum of Understanding City of Reform Program	Deliberative process	
PRIV_001144	Snyder, Rick	Isaacs, Carol (AG) ; Schneider, Matthew (AG)	Gadola, Michael (GOV)		6/6/2013	Bankruptcy Questions	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001145	Snyder, Rick	Snyder, Rick (GOV)	Brader, Valerie (GOV)	Gadola, Michael (GOV); Muchmore, Dennis (GOV); Rustem, William (GOV); Tedder, Greg (GOV); Scott, Allison (GOV); Roberts, John (GOV)	11/27/2013	Decisions Needed re DWSD	Attorney Client Communication; Deliberative process; Mediation	Document/email containing communication with attorney
PRIV_001146	Snyder, Rick	Snyder, Rick (GOV); Tedder, Greg (GOV); Gadola, Michael (GOV)	Brader, Valerie (GOV)		12/17/2013	Fwd: DIA Statewide Proposal	Mediation	Document/email discussing a subject incident to mediation
PRIV_001147	Snyder, Rick				12/16/2013	Attachment: The Detroit Institute of ArtsState of Michigan A Renewed Partnership - Draft	Mediation	Document/email discussing a subject incident to mediation
PRIV_001148	Snyder, Rick	Gadola, Michael (GOV); Snyder, Rick (GOV); Muchmore, Dennis (GOV); Roberts, John (DTMB); Posthumus, Dick (GOV); Tedder, Greg (GOV)	Brader, Valerie (GOV)	Scott, Allison (GOV)	12/26/2013	RE: Mediation-Confidential attorney-client communication and subject to non-disclosure under federal court mediation order/rules	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001149	Snyder, Rick	Snyder, Rick (GOV)	Gadola, Michael (GOV)	Brader, Valerie (GOV); Muchmore, Dennis (GOV); Roberts, John (DTMB); Posthumus, Dick (GOV); Tedder, Greg (GOV); Scott, Allison (GOV)	12/27/2013	Re: Mediation—Confidential attomey-client communication and subject to non-disclosure under federal court mediation order/rules	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001150	Snyder, Rick					Memo: Detroit Mediation	Attorney Client Communication; Mediation	Document/email discussing a subject incident to mediation
PRIV_001151	Snyder, Rick	Snyder, Rick (GOV)	Scott, Allison (GOV)		12/30/2013	Confidential - subject to Mediation Order	Mediation	Document/email discussing a subject incident to mediation
PRIV_001152	Snyder, Rick	Muchmore, Dennis (GOV)	Brader, Valerie (GOV)	Scott, Allison (GOV); Tedder, Greg (GOV); Priest, Chris (GOV); Clinton, Kevin (TREASURY); Roberts, John (DTMB); Rustern, William (GOV); Snyder, Rick (GOV)	12/31/2013	Re: For tomorrow	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001153	Snyder, Rick	Snyder, Rick (GOV)	Brader, Valerie (GOV)	Muchmore, Dennis (GOV); Calley, Brian (GOV); Tedder, Greg (GOV); lukasz@paszek.com; Rustem, William (GOV); Roberts, John (DTMB); Priest, Chris (GOV); Clinton, Kevin (TREASURY); Saxton, Thomas (Treasury)	12/31/2013	CONFIDENTIAL - MEDIATION- UTGO proceeds	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001154	Snyder, Rick	Snyder, Rick (GOV)	Scott, Allison (GOV)		1/4/2014	Fwd: Email for the Governor	Mediation	Document/email discussing a subject incident to mediation
PRIV_001155	Snyder, Rick	Snyder, Rick (GOV)	Steve Hamp		1/10/2014	The Art Trust in support of the DIA and the Detroit Pensions	Mediation	Document/email discussing a subject incident to mediation
PRIV_001156	Snyder, Rick					Draft Statement of Detroit Bankruptcy Mediators concerning the Art Trust Plan	Mediation	Document/email discussing a subject incident to mediation
PRIV_001157	Snyder, Rick	Snyder, Rick (GOV)	Gerald_Rosen		1/13/2014	Fwd: Deal could come as early as today to protect DIA art, Detroit pen	Mediation	Document/email discussing a subject incident to mediation
PRIV_001158	Snyder, Rick	Snyder, Rick (GOV)	Brader, Valerie (GOV)	lukasz@paszek.com; Scott, Allison (GOV); Muchmore, Dennis (GOV); Roberts, John (DTMB)	1/20/2014	CONFIDENTIAL: numbers	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation

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PRIV_001159	Snyder, Rick	Gerald_Rosen	Brader, Valerie (GOV)	Gadola, Michael (GOV); Snyder, Rick (GOV); Schneider, Matthew (AG); Scott, Allison (GOV)	1/20/2014	Detroit Mediation Settlement Terms	Mediation	Document/email discussing a subject incident to mediation
PRIV_001160	Snyder, Rick	<u></u>		matthew (No), coatt, nincon (Cov)	1/19/2014	Detroit Settlement Conditions Draft Analysis	Mediation	Document/email discussing a subject incident to mediation
PRIV_001161	Snyder, Rick	Brader, Valerie (GOV)	Gerald_Rosen	Gadola, Michael (GOV); Schneider, Matthew (AG); Scott, Allison (GOV); Snyder, Rick (GOV)	1/20/2014	Re: Detroit Mediation Settlement Terms	Mediation	Document/email discussing a subject incident to mediation
PRIV_001162	Snyder, Rick	Brader, Valerie (GOV)	Gerald_Rosen	Gadola, Michael (GOV); Schneider, Matthew (AG); Scott, Allison (GOV); Snyder, Rick (GOV)	1/20/2014	Re: Detroit Mediation Settlement Terms	Mediation	Document/email discussing a subject incident to mediation
PRIV_001163	Snyder, Rick	Gerald_Rosen	Brader, Valerie (GOV)	Gadola, Michael (GOV); Schneider, Matthew (AG); Scott, Allison (GOV); Snyder, Rick (GOV)	1/20/2014	RE: Detroit Mediation Settlement Terms	Mediation	Document/email discussing a subject incident to mediation
PRIV_001164	Snyder, Rick	Snyder, Rick (GOV) ; Brader, Valerie (GOV)	Gadola, Michael (GOV)		1/20/2014	Fwd: Detroit Mediation Settlement Terms	Attorney Client Communication; Deliberative process; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001165	Snyder, Rick	Snyder, Rick (GOV)	Gadola, Michael (GOV)	Brader, Valerie (GOV); Muchmore, Dennis (GOV); Roberts, John (DTMB); Scott, Allison (GOV)	1/20/2014	Re: Detroit Mediation Settlement Terms; Notice: Confidential - mediation related	Attorney Client Communication; Deliberative process; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001166	Snyder, Rick	Snyder, Rick (GOV)	Brader, Valerie (GOV)	Scott, Allison (GOV); Ellison, Melanie (GOV); Gadola, Michael (GOV); Tedder, Greg (GOV)	1/21/2014	Detroit mediation progress report	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001167	Snyder, Rick	Snyder, Rick (GOV)	Baird, Richard (GOV)	Scott, Allison (GOV)	1/23/2014	Today's Meeting with Mike Duggan and Kevyn Orr	Deliberative process	Email containing pre-decisional deliberations
PRIV_001168	Snyder, Rick					Statement of Detroit Bankruptcy Mediators	Mediation	Document/email discussing a subject incident to mediation
PRIV_001169	Snyder, Rick	Snyder, Rick (GOV)	Brader, Valerie (GOV)	Gadola, Michael (GOV); Posthumus, Dick (GOV); Muchmore, Dennis (GOV); Tedder, Greg (GOV)	1/25/2014	Law to put \$350M solution in place	Attorney Client Communication; Deliberative process; Mediation	
PRIV_001170	Snyder, Rick				1/24/2014	Draft 1: Senate House Bill	Attorney Client Communication; Deliberative process	
PRIV_001171	Snyder, Rick					Draft Plan of Adjustment	Common Interest Agreement; Attorney Work Product	
PRIV_001172	Snyder, Rick				1/26/2014	Working Draft City of Detroit Proposed Plan of Adjustment	Common Interest Agreement	
PRIV_001173	Snyder, Rick					Draft Treatment of Claims document	Common Interest Agreement	
PRIV_001174	Snyder, Rick	Snyder, Rick (GOV)	Gerald_Rosen		1/27/2014	A preview of our 4 PM conference call	Deliberative process; Executive	
PRIV_001175	Snyder, Rick					Statementt of Detroit Bankruptcy Mediators	Mediation	
PRIV_001176	Snyder, Rick	Snyder, Rick (GOV)	Gadola, Michael (GOV)	Brader, Valerie (GOV); Scott, Allison (GOV)	1/28/2014	FW: Potential Sources of Revenue (Settlement) CONFIDENTIAL/ ATTORNEY-CLIENT COMMUNICATION	Attorney Client Communication; Common Interest Agreement; Mediation	
PRIV_001177	Snyder, Rick					Potential State Settlement Revenue Sources	Mediation	
PRIV_001178	Snyder, Rick					Draft Plan of Adjustment	Common Interest Agreement; Attorney Work Product; Mediation	Document/email discussing a subject incident to mediation
PRIV_001179	Snyder, Rick					City of Detroit Plan of adjustment scenarios	Mediation	Document/email discussing a subject incident to mediation
PRIV_001180	Snyder, Rick	Wurfel, Sara (GOV)	Brader, Valerie (GOV)	Tedder, Greg (GOV); Snyder, Rick (GOV); Muchmore, Dennis (GOV); Agen, Jarrod (GOV); Gadola, Michael (GOV); Scott, Allison (GOV)	1/31/2014	Re: WSJ broke the story	Mediation	Document/email discussing a subject incident to mediation
PRIV_001181	Snyder, Rick	Snyder, Rick (GOV) ; Brader, Valerie (GOV)	Gadola, Michael (GOV)	Wurfel, Sara (GOV); Tedder, Greg (GOV); Muchmore, Dennis (GOV); Agen, Jarrod (GOV); Scott, Allison (GOV)	1/31/2014	RE: WSJ broke the story	Attorney Client Communication; Attorney Work Product; Deliberative process; Executive; Mediation	Document/email discussing a subject incident to mediation
PRIV_001182	Snyder, Rick					City of Detroit Illustrative Cash Flow Forecast - Work in Progress	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email discussing a subject incident to mediation
PRIV_001183	Snyder, Rick					Project Piston Plan of Adjustment	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email discussing a subject incident to mediation

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PRIV_001184	Snyder, Rick					House Republican Detroit Settlement Action Plan: Commitment and Conditions	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email discussing a subject incident to mediation
PRIV_001185	Snyder, Rick	Muchmore, Dennis (GOV); Snyder, Rick (GOV); Brader, Valerie (GOV)	Kevyn Orr	Scott, Allison (GOV); Ackerman, Darin (GOV); Posthumus, Dick (GOV); Tedder, Greg (GOV); Durfee, Sally (GOV); Stacy Fox	2/4/2014	RE: Michigan AFSCME on Governor Snyder's Proposal - City of Detroit	Deliberative process; Executive; Mediation	Document/email containing communication with attorney; Document/email discussing a subject lincident to mediation
PRIV_001186	Snyder, Rick	Snyder, Rick (GOV)	Gerald_Rosen		2/5/2014	Recap on UTGOs	Common Interest Agreement; Mediation	Document/email discussing a subject incident to mediation
PRIV_001187	Snyder, Rick	Gerald Rosen	Blackstone Advisory Partners		2/4/2014	UTGOs	Mediation	Document/email discussing a subject incident to mediation
PRIV_001188	Snyder, Rick	Snyder, Rick (GOV); Gadola, Michael (GOV)	Brader, Valerie (GOV)	Muchmore, Dennis (GOV)	2/5/2014	RE: Recap on UTGOs	Mediation	Document/email discussing a subject incident to mediation
PRIV_001189	Snyder, Rick	Brader, Valerie (GOV)	Gadola, Michael (GOV)	Snyder, Rick (GOV) ; Muchmore, Dennis (GOV)	2/5/2014	Re: Recap on UTGOs	Attomey Client Communication; Common Interest Agreement; Mediation	Document/email discussing a subject incident to mediation
PRIV_001190	Snyder, Rick	Snyder, Rick (GOV)	Brader, Valerie (GOV)	Gadola, Michael (GOV); Saxton, Thomas (Treasury); Tedder, Greg (GOV); Muchmore, Dennis (GOV); Ellison, Melanie (GOV); Scott, Allison (GOV); Clement, Elizabeth (GOV); Clinton, Kevin (TREASURY); Clinton, Kevin (TREASURY); Roberts, John (DTMB); lukasz@paszek.com; Priest, Chris (GOV)	2/14/2014	FW: Detroit - Financials	Mediation	Document/email discussing a subject incident to mediation
PRIV_001191	Snyder, Rick				2/14/2014	Agenda Governor Rick Snyder Supplemental Briefing Plan of Adjustment	Common Interest Agreement; Deliberative process; Executive; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001192	Snyder, Rick	Snyder, Rick (GOV)	Gadola, Michael (GOV)	Muchmore, Dennis (GOV); Scott, Allison (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV)	2/18/2014	Update-Meeting with Judge Rosen	Attorney Client Communication; Attorney Work Product; Deliberative process; Executive; Mediation	Document/email discussing a subject incident to mediation
PRIV_001193	Snyder, Rick	Tedder, Greg (GOV); Agen, Jarrod (GOV); Wurfel, Sara (GOV); Snyder, Rick (GOV); Scott, Allison (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Roberts, John (DTMB); Clinton, Kevin (TREASURY); Saxton, Thomas	Brader, Valerie (GOV)		2/20/2014	Fwd: Plan of Adjustment CONFIDENTIAL – SUBJECT TO CI AND MEDIATION ORDER	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001194	Snyder, Rick	Snyder, Rick (GOV); Muchmore, Dennis (GOV); Posthumus, Dick (GOV)	Gadola, Michael (GOV)	Scott, Allison (GOV) ; Brader, Valerie (GOV) ; Clement, Elizabeth (GOV)	2/21/2014	Retiree Committee	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001195	Snyder, Rick	Snyder, Rick (GOV)	Brader, Valerie (GOV)	Scott, Allison (GOV); lukasz@paszek.com; Priest, Chris (GOV); Gadola, Michael (GOV)	2/21/2014	LowIncomeModel: Confidential - Subject to mediation order	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email discussing a subject incident to mediation
PRIV_001196	Snyder, Rick					Attachment regarding low income model; cost to maintain threshold	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001197	Snyder, Rick					Draft Post Bankruptcy Financial Oversight Options for City of Detroit	Deliberative process; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001198	Snyder, Rick	Snyder, Rick (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV); Muchmore, Dennis (GOV); Posthumus, Dick (GOV)	Gadola, Michael (GOV)	Scott, Allison (GOV); Clement, Elizabeth (GOV)	3/3/2014	FW: Detroit	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email discussing a subject incident to mediation
PRIV_001199	Snyder, Rick	Administration/Senate	Brock Swartzle	Brian Mills, Scott Starr, Travis Wever	3/3/2014	Proposed Detroit Settlement	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email discussing a subject incident to mediation

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PRIV_001200	Snyder, Rick					Draft Bill Art Institute Authorities Act	Mediation	Document/email discussing a subject incident to mediation
PRIV_001201	Snyder, Rick	Brader, Valerie (GOV)	Calley, Brian (GOV)	Muchmore, Dennis (GOV); Snyder, Rick (GOV); Baird, Richard (GOV); Gadola, Michael (GOV); Scott, Allison (GOV); Tedder, Greg (GOV)	3/4/2014	Re: CONFIDENTIAL AND SUBJECT TO ATTY CLIENT PRIVILEGE	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email discussing a subject incident to mediation
PRIV_001202	Snyder, Rick	Snyder, Rick (GOV); Brader, Valerie (GOV); Baird, Richard (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth	Tedder, Greg (GOV)	Scott, Allison (GOV) ; Gadola, Michael (GOV)	3/21/2014	DRAFT SUMMARY - Financial Control Board for City of Detroit Post-Bankruptcy NYC Model	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email discussing a subject incident to mediation
PRIV_001203	Snyder, Rick	, , , , , , , , , , , , , , , , , , , ,				Draft Financial Control Board for City of Detroit, Post- Bankruptcy (New York City Financial Control Board Model)	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001204	Snyder, Rick	Snyder, Rick (GOV)	Gerald_Rosen		3/23/2014	Fw: State Conditions	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email discussing a subject incident to mediation
PRIV_001205	Snyder, Rick					Attachment: Confidential Conditions to Contribution by State of Michigan	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email discussing a subject incident to mediation
PRIV_001206	Snyder, Rick					Attachment: Exhibit 1 to Confidential Conditions to Contribution by State of Michigan	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email discussing a subject incident to mediation
PRIV_001207	Snyder, Rick				٠	Attachment: Proposed Structure for Income Stablization (State Portion)	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email discussing a subject incident to mediation
PRIV_001208	Snyder, Rick	Gadola, Michael (GOV)	Snyder, Rick (GOV)	Brader, Valerie (GOV); Tedder, Greg (GOV); Muchmore, Dennis (GOV); Posthumus, Dick (GOV); Scott, Allison (GOV)	3/23/2014	Re: A heads up about the "State conditions"	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email discussing a subject incident to mediation
PRIV_001209	Snyder, Rick	Baird, Richard (GOV); Snyder, Rick (GOV); Gadola, Michael (GOV); Tedder, Greg (GOV); Posthumus, Dick (GOV)	Brader, Valerie (GOV)		4/15/2014	AFSCME outsourcing terms— CONFIDENTIAL, ATTY CLIENT, SUBJECT TO MEDIATION ORDER	Attorney Client Communication; Attorney Work Product; Deliberative process; Executive; Mediation	Document/email discussing a subject incident to mediation
PRIV_001210	Snyder, Rick					Attachment: Outsourcing terms - confidential subject to mediation order	Attorney Client Communication; Attorney Work Product; Deliberative process; Executive; Mediation	Document/email discussing a subject incident to mediation
PRIV_001211	Snyder, Rick	Brader, Valerie (GOV)	Posthumus, Dick (GOV)	Baird, Richard (GOV); Snyder, Rick (GOV); Gadola, Michael (GOV); Tedder, Greg (GOV)	4/15/2014	Re: AFSCME outsourcing terms CONFIDENTIAL, ATTY CLIENT, SUBJECT TO MEDIATION ORDER	Deliberative process; Executive; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001212	Snyder, Rick	Brader, Valerie (GOV)	Wurfel, Sara (GOV)	Snyder, Rick (GOV); Calley, Brian (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Posthumus, Dick (GOV); Tedder, Greg (GOV); Gadola, Michael (GOV); Baird, Richard (GOV); Agen, Jarrod (GOV); Scott, Allison (GOV); Wisniewski, Wendy (GOV)	4/15/2014	RE: DRAFT statement on Detroit agreement with AFSCME, retired police and firefighers	Common Interest Agreement; Mediation	Document/email discussing a subject incident to mediation
PRIV_001213	Snyder, Rick					Memo: Major Additions/Changes to City of Detroit Plan of Adjustment	Common Interest Agreement; Mediation	Document/email discussing a subject incident to mediation
PRIV_001214	Snyder, Rick	Wurfel, Sara (GOV)	Gadola, Michael (GOV)	Brader, Valene (GOV); Snyder, Rick (GOV); Calley, Brian (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Posthumus, Dick (GOV); Tedder, Greg (GOV); Baird, Richard (GOV); Agen, Jarrod (GOV); Scott, Allison (GOV); Wisniewski, Wendy (GOV)	4/15/2014	Re: DRAFT statement on Detroit agreement with AFSCME, retired police and firefighers	Attorney Client Communication; Attorney Work Product; Deliberative process; Executive; Mediation	Document/email discussing a subject incident to mediation
PRIV_001215	Snyder, Rick	Snyder, Rick (GOV)	Gadola, Michael (GOV)	Wurfel, Sara (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV); Agen, Jarrod (GOV); Scott, Allison (GOV)	4/16/2014	Re: Detroit - Second Amended Plan of Adjustment and Second Amended Disclosure Statement (As- Filed)	Deliberative process; Executive; Mediation	Document/email discussing a subject incident to mediation
PRIV_001216	Snyder, Rick	Snyder, Rick (GOV)	Gadola, Michael (GOV)	Wurfel, Sara (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV); Agen, Jarrod (GOV); Scott, Allison (GOV)	4/16/2014	Re: Detroit - Second Amended Plan of Adjustment and Second Amended Disclosure Statement (As- Filed)	Attorney Client Communication; Attorney Work Product; Deliberative process; Executive; Mediation	Document/email discussing a subject incident to mediation

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_001217	Snyder, Rick	Snyder, Rick (GOV)	Brader, Valerie (GOV)	Gadola, Michael (GOV) ; Muchmore, Dennis (GOV) ; Tedder, Greq (GOV)	10/24/2013	For meeting with Judge Rosen tomorrow	Mediation	Document/email discussing a subject incident to mediation
PRIV_001218	Snyder, Rick			10000, 0103 (00.17)	10/7/2014	State of Michigan's Confidential Mediation Statement	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email discussing a subject incident to mediation
PRIV_001219	Snyder, Rick	Snyder, Rick (GOV)	Scott, Allison (GOV)	Gadola, Michael (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV); Muchmore, Dennis (GOV); Posthumus, Dick (GOV)	3/23/2014	Call at 4:30 today - not yet showing on calendar	Mediation	Document/email discussing a subject incident to mediation
PRIV_001220	Snyder, Rick	Snyder, Rick (GOV) ; Scott, Allison (GOV)	Wisniewski, Wendy (GOV)	Muchmore, Dennis (GOV); Roberts, John (DTMB)	6/5/2013	Fwd: *Privileged and Confidential* - Not Subject to Disclosure Under FOIA - Detroit - Creditor Proposal Outline	Attorney Client Communication; Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product; Document/email containing communication with attorney
PRIV_001221	Snyder, Rick					Draft Proposal for Creditors	Attomey Client Communication; Common Interest Agreement; Attomey Work Product	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_001222	Snyder, Rick	Snyder, Rick (GOV); Calley, Brian (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Posthumus, Dick (GOV); Tedder, Greg (GOV); Gadola, Michael (GOV); Brader, Valerie (GOV); Baird, Richard (GOV)	Wurfel, Sara (GOV)	Agen, Jarrod (GOV); Scott, Allison (GOV); Wisniewski, Wendy (GOV)	4/15/2014	DRAFT statement on Detroit agreement with AFSCME, retired police and firefighers	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001223	Snyder, Rick					Upon further review, this document should not have been included with privilege log. It is nonresponsive	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001224	Snyder, Rick	Snyder, Rick (GOV)	Brader, Valerie (GOV)	Wurfel, Sara (GOV); Calley, Brian (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Posthumus, Dick (GOV); Tedder, Greg (GOV); Gadola, Michael (GOV); Baird, Richard (GOV); Agen, Jarrod (GOV); Scott, Allison (GOV); Wisniewski, Wendy (GOV)	4/15/2014	Re: DRAFT statement on Detroit agreement with AFSCME, retired police and firefighers	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001225	Snyder, Rick	Brader, Valerie (GOV) ; Snyder, Rick (GOV)	Wurfel, Sara (GOV)	Calley, Brian (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Posthumus, Dick (GOV); Tedder, Greg (GOV); Gadola, Michael (GOV); Baird, Richard (GOV); Agen, Jarrod (GOV); Scott, Allison (GOV); Wisniewski, Wendy (GOV)	4/15/2014	RE: DRAFT statement on Detroit agreement with AFSCME, retired police and firefighers	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001226	Snyder, Rick	Wurfel, Sara (GOV)	Brader, Valene (GOV)	Snyder, Rick (GOV); Calley, Brian (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Posthumus, Dick (GOV); Tedder, Greg (GOV); Gadola, Michael (GOV); Baird, Richard (GOV); Agen, Jarrod (GOV); Scott, Allison (GOV); Wisniewski, Wendy (GOV)	4/15/2014	Re: DRAFT statement on Detroit agreement with AFSCME, retired police and firefighers	Attomey Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001227	Snyder, Rick	Wurfel, Sara (GOV)	Brader, Valerie (GOV)	Snyder, Rick (GOV); Calley, Brian (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Posthumus, Dick (GOV); Tedder, Greg (GOV); Gadola, Michael (GOV); Baird, Richard (GOV); Agen, Jarrod (GOV); Scott, Allison (GOV); Wisniewski, Wendy (GOV)	4/15/2014	Revised plan of action on POA – Atty client, confidential	Attorney Client Communication; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_001228	Snyder, Rick	Brader, Valerie (GOV)	Gadola, Michael (GOV)	Wurfel, Sara (GOV); Snyder, Rick (GOV); Calley, Brian (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Posthumus, Dick (GOV); Tedder, Greg (GOV); Baird, Richard (GOV); Agen, Jarrod (GOV); Scott, Allison (GOV); Wisniewski, Wendy (GOV)	4/15/2014	Re: Revised plan of action on POA – Atty client, confidential	Attorney Client Communication; Common Interest Agreement	Document/email containing communication with attorney

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_001229	Snyder, Rick	Snyder, Rick (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Gadola, Michael (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV); Agen, Jarrod (GOV)	Wurfel, Sara (GOV)	Scott, Allison (GOV)	4/16/2014	FW: Detroit - Second Amended Plan of Adjustment and Second Amended Disclosure Statement (As-Filed)	Attomey Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001230	Snyder, Rick	Wurfel, Sara (GOV); Snyder, Rick (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV); Agen, Jarrod (GOV)	Gadola, Michael (GOV)	Scott, Allison (GOV)	4/16/2014	RE: Detroit - Second Amended Plan of Adjustment and Second Amended Disclosure Statement (As-Filed)	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001231	Snyder, Rick	Gadola, Michael (GOV); Snyder, Rick (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV); Agen, Jarrod (GOV)	Wurfel, Sara (GOV)	Scott, Allison (GOV)	4/16/2014	RE: Detroit - Second Amended Plan of Adjustment and Second Amended Disclosure Statement (As-Filed)	Mediation	Document/email discussing a subject incident to mediation
PRIV_001232	Snyder, Rick	Snyder, Rick (GOV)	Wurfel, Sara (GOV)	Gadola, Michael (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV); Agen, Jarrod (GOV); Scott, Allison (GOV)	4/16/2014	RE: Detroit - Second Amended Plan of Adjustment and Second Amended Disclosure Statement (As-Filed)	Mediation	Document/email discussing a subject incident to mediation
PRIV_001233	Snyder, Rick	Snyder, Rick (GOV)	Wurfel, Sara (GOV)	Gadola, Michael (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV); Agen, Jarrod (GOV); Scott, Allison (GOV)	4/16/2014	Re: Detroit - Second Amended Plan of Adjustment and Second Amended Disclosure Statement (As-Filed)	Mediation	Document/email discussing a subject incident to mediation
PRIV_001234	Snyder, Rick		•		12/18/2013	Detroit Mediation 131218	Mediation	Document/email discussing a subject incident to mediation
PRIV_001235	Snyder, Rick	Brader, Valerie (GOV)	Snyder, Rick (GOV)	Scott, Allison (GOV); Tedder, Greg (GOV)	12/18/2013	Detroit Mediation 131218	Mediation	Document/email discussing a subject incident to mediation
PRIV_001236	Snyder, Rick	Scott, Allison (GOV)	Snyder, Rick (GOV)		12/19/2013	Fwd: Detroit Mediation 131218	Mediation	Document/email discussing a subject incident to mediation
PRIV_001237	Snyder, Rick	Gadola, Michael (GOV)	Snyder, Rick (GOV)	Brader, Valerie (GOV); Muchmore, Dennis (GOV); Roberts, John (DTMB); Posthumus, Dick (GOV); Tedder, Greg (GOV); Scott, Allison (GOV)	12/27/2013	Re: Mediation-Confidential attorney-client communication and subject to non-disclosure under federal court mediation order/rules	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001238	Snyder, Rick	Brader, Valerie (GOV) ; Tedder, Greg (GOV)	Snyder, Rick (GOV)	Calley, Brian (GOV); Muchmore, Dennis (GOV); Roberts, John (DTMB); Scott, Allison (GOV); Gadola, Michael (GOV)	12/30/2013	Re: Confidential - subject to Mediation Order	Mediation	Document/email discussing a subject incident to mediation
PRIV_001239	Snyder, Rick	Hansen, Rachel (GOV)	Snyder, Rick (GOV)		1/7/2014	FW: Detroit mediation – confidential	Mediation	Document/email discussing a subject incident to mediation
PRIV_001240	Snyder, Rick	Brader, Valerie (GOV)	Snyder, Rick (GOV)		1/7/2014	RE: Detroit mediation confidential	Mediation	Document/email discussing a subject incident to mediation
PRIV_001241	Snyder, Rick	Wurfel, Sara (GOV)	Snyder, Rick (GOV)	Muchmore, Dennis (GOV); Roberts, John (DTMB); Brader, Valerie (GOV); Tedder, Greg (GOV)	1/12/2014	Re: Notice: subject to mediation	Mediation	Document/email discussing a subject incident to mediation
PRIV_001242	Snyder, Rick	Brader, Valerie (GOV)	Snyder, Rick (GOV)		1/15/2014	FW: Developments	Mediation; Personal information	Document/email discussing a subject incident to mediation
PRIV_001243	Snyder, Rick	Brader, Valerie (GOV)	Snyder, Rick (GOV)	Scott, Allison (GOV); Muchmore, Dennis (GOV); Gadola, Michael (GOV); Tedder, Greg (GOV); Roberts, John (DTMB)	1/19/2014	Re: Detroit Settlement Conditions	Mediation	Document/email discussing a subject incident to mediation

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_001244	Snyder, Rick	Brader, Valerie (GOV)	Snyder, Rick (GOV)	Scott, Allison (GOV); Muchmore, Dennis (GOV); Gadola, Michael (GOV); Tedder, Greg (GOV); Roberts, John (DTMB)	1/19/2014	Re: Detroit Revised Conditions Draft	Mediation	Document/email discussing a subject incident to mediation
PRIV_001245	Snyder, Rick	Gadola, Michael (GOV)	Snyder, Rick (GOV)	Brader, Valerie (GOV); Scott, Allison (GOV); Muchmore, Dennis (GOV); Tedder, Greg (GOV); Roberts, John (DTMB)	1/19/2014	Re: Settlement List	Mediation	Document/email discussing a subject incident to mediation
PRIV_001246	Snyder, Rick	Brader, Valerie (GOV) ; Gadola, Michael (GOV)	Snyder, Rick (GOV)		1/19/2014	Fwd: Brian Dickerson: Foundations and auto show spotlight magnify pres	Mediation	Document/email discussing a subject incident to mediation
PRIV_001247	Snyder, Rick	Gadola, Michael (GOV)	Snyder, Rick (GOV)	Brader, Valerie (GOV); Scott, Allison (GOV); Muchmore, Dennis (GOV); Tedder, Greg (GOV); Roberts, John (DTMB)	1/20/2014	Re: Settlement List	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001248	Snyder, Rick	Brader, Valerie (GOV) ; Tedder, Greg (GOV)	Snyder, Rick (GOV)	Muchmore, Dennis (GOV); Roberts, John (DTMB); Scott, Allison (GOV)	1/20/2014	Fwd: Grand Bargain ***SUBJECT TO FEDERAL MEDIATION ORDER— PRIVILEGED/CONFIDENTIAL COMMUNICATION— DO NOT FORWARD***	Attomey Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001249	Snyder, Rick	Gadola, Michael (GOV)	Snyder, Rick (GOV)	Brader, Valerie (GOV)	1/20/2014	Re: Detroit Mediation Settlement Terms	Attomey Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001250	Snyder, Rick	Jase Bolger	Snyder, Rick (GOV)		1/20/2014	Fwd: CONFIDENTIAL: numbers	Mediation	Document/email discussing a subject incident to mediation
PRIV_001251	Snyder, Rick	Gadola, Michael (GOV)	Snyder, Rick (GOV)	Brader, Valerie (GOV); Muchmore, Dennis (GOV); Roberts, John (DTMB); Scott, Allison (GOV)	1/20/2014	Re: Detroit Mediation Settlement Terms; Notice: Confidential - mediation related	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001252	Snyder, Rick	Brader, Valerie (GOV)	Snyder, Rick (GOV)	Agen, Jarrod (GOV); Muchmore, Dennis (GOV); Scott, Allison (GOV); Wurfel, Sara (GOV); Tedder, Greg (GOV); Roberts, John (DTMB)	1/21/2014	Re: Draft Mediation Settlement Release (JA).docx	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001253	Snyder, Rick	Gerald_Rosen'	Snyder, Rick (GOV)	Brader, Valerie (GOV); Gadola, Michael (GOV); Tedder, Greg (GOV); Scott, Allison (GOV); Posthumus, Dick (GOV); Agen, Jarrod (GOV); Muchmore, Dennis (GOV); Roberts, John (GOV)	1/21/2014	Draft Settlement Conditions; Notice: Confidential subject to Mediation Order	Mediation	Document/email discussing a subject incident to mediation
PRIV_001254	Snyder, Rick	Agen, Jarrod (GOV)	Snyder, Rick (GOV)	Muchmore, Dennis (GOV); Roberts, John (DTMB); Reid, Teresa (GOV) >; Brader, Valerie (GOV); Tedder, Greg (GOV); Wurfel, Sara (GOV); Scott, Allison (GOV); Ellison, Melanie (GOV); Emmitt, Beth (GOV); Posthumus, Dick (GOV)	1/21/2014	Re: Comms Documents for Detroit Press Event	Mediation	Document/email discussing a subject incident to mediation
PRIV_001255	Snyder, Rick	Scott, Allison (GOV)	Snyder, Rick (GOV)	Brader, Valerie (GOV); Gadola, Michael (GOV); Tedder, Greg (GOV)	1/22/2014	Fwd: BRAVO!	Mediation	Document/email discussing a subject incident to mediation
PRIV_001256	Snyder, Rick	Gadola, Michael (GOV)	Snyder, Rick (GOV)	Tedder, Greg (GOV); Scott, Allison (GOV); Brader, Valerie (GOV)	1/23/2014	Re: Mediators Statement of appreciation for Legislative Leaders support	Mediation	Document/email discussing a subject incident to mediation
PRIV_001257	Snyder, Rick	Brader, Valerie (GOV)	Snyder, Rick (GOV)	Gadola, Michael (GOV)	1/27/2014	Fwd: A preview of our 4 PM conference call	Mediation	Document/email discussing a subject incident to mediation
PRIV_001258	Snyder, Rick	Gerald_Rosen	Snyder, Rick (GOV)		1/27/2014	Re: A preview of our 4 PM conference call	Mediation	Document/email discussing a subject incident to mediation
PRIV_001259	Snyder, Rick	Gerald_Rosen	Snyder, Rick (GOV)		1/27/2014	Re: A preview of our 4 PM conference call	Mediation	Document/email discussing a subject incident to mediation
PRIV_001260	Snyder, Rick	Jase Bolger	Snyder, Rick (GOV)	Muchmore, Dennis (GOV); Norm Saari; Brock Swartzle; Brader, Valerie (GOV); Gadola, Michael (GOV)	1/28/2014	Re: Detroit Pension Settlement - Notice - Confidential subject to Mediation Order	Mediation	Document/email discussing a subject incident to mediation
PRIV_001261	Snyder, Rick	Posthumus, Dick (GOV)	Snyder, Rick (GOV)	Muchmore, Dennis (GOV); Orr Kevyn D.; Durfee, Sally (GOV); Brader, Valerie (GOV); Ackerman, Darin (GOV); Tedder, Greg (GOV); Scott, Allison (GOV)	2/4/2014	Re: Michigan AFSCME on Governor Snyder's Proposal - City of Detroit	Mediation	Document/email discussing a subject incident to mediation

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_001262	Snyder, Rick	Muchmore, Dennis (GOV)	Snyder, Rick (GOV)	Brader, Valerie (GOV); Orr Kevyn D.; Posthumus, Dick (GOV); Durfee, Sally (GOV); Ackerman, Darin (GOV); Tedder, Greg (GOV); Scott, Allison (GOV)	2/4/2014	Re: Michigan AFSCME on Governor Snyder's Proposal - City of Detroit	Mediation	Document/email discussing a subject incident to mediation
PRIV_001263	Snyder, Rick	Brader, Valerie (GOV) ; Gadola, Michael (GOV)	Snyder, Rick (GOV)	Muchmore, Dennis (GOV)	2/5/2014	Fwd: Recap on UTGOs	Mediation	Document/email discussing a subject incident to mediation
PRIV_001264	Snyder, Rick	Gerald Rosen	Blackstone Advisory Partners		2/4/2014	UTGOs	Mediation	Document/email discussing a subject incident to mediation
PRIV_001265	Snyder, Rick	Agen, Jarrod (GOV)	Snyder, Rick (GOV)	Muchmore, Dennis (GOV); Wurfel, Sara (GOV); Tedder, Greg (GOV); Brader, Valerie (GOV); Gadola, Michael (GOV); Baird, Richard (GOV); Scott, Allison (GOV); Roberts, John (DTMB); Clement, Elizabeth (GOV); Wisniewski, Wendy (GOV)	2/20/2014	Re: POA Message Docs	Mediation	Document/email discussing a subject incident to mediation
PRIV_001266	Snyder, Rick	Gadola, Michael (GOV)	Snyder, Rick (GOV)	Brader, Valerie (GOV); Tedder, Greg (GOV); Muchmore, Dennis (GOV); Posthumus, Dick (GOV); Scott, Allison (GOV)	3/23/2014	Re: A heads up about the "State conditions"	Mediation	
PRIV_001267	Snyder, Rick	Brader, Valerie (GOV)	Snyder, Rick (GOV)	Gadola, Michael (GOV); Scott, Allison (GOV); Tedder, Greg (GOV); Muchmore, Dennis (GOV); Posthumus, Dick (GOV)	3/24/2014	Re: Conf call today	Executive; Mediation	
PRIV_001268	Snyder, Rick	Wurfel, Sara (GOV)	Snyder, Rick (GOV)	Calley, Brian (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Posthumus, Dick (GOV); Tedder, Greg (GOV); Gadola, Michael (GOV); Brader, Valerie (GOV); Baird, Richard (GOV); Agen, Jarrod (GOV); Scott, Allison (GOV); Wisniewski, Wendy (GOV)	4/15/2014	Re: DRAFT statement on Detroit agreement with AFSCME, retired police and firefighers	Mediation	
PRIV_001269	Snyder, Rick	Wurfel, Sara (GOV)	Snyder, Rick (GOV)	Gadola, Michael (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV); Agen, Jarrod (GOV); Scott, Allison (GOV)	4/16/2014	Re: Detroit - Second Amended Plan of Adjustment and Second Amended Disclosure Statement (As- Filed)	Mediation	
PRIV_001270	Snyder, Rick	Wurfel, Sara (GOV)	Snyder, Rick (GOV)	Gadola, Michael (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV); Agen, Jarrod (GOV); Scott, Allison (GOV)	4/16/2014	Re: Detroit - Second Amended Plan of Adjustment and Second Amended Disclosure Statement (As- Filed)	Mediation	
PRIV_001271	Snyder, Rick	Wurfel, Sara (GOV)	Snyder, Rick (GOV)	Gadola, Michael (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV); Agen, Jarrod (GOV); Scott, Allison (GOV)	4/16/2014	Re: Detroit - Second Amended Plan of Adjustment and Second Amended Disclosure Statement (As-Filed)		
PRIV_001272	Snyder, Rick	Gadola, Michael (GOV)	Snyder, Rick (GOV)	Wurfel, Sara (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV); Brader, Valerie (GOV); Tedder, Greg (GOV); Agen, Jarrod (GOV); Scott, Allison (GOV)	4/16/2014	Re: Detroit - Second Amended Plan of Adjustment and Second Amended Disclosure Statement (As- Filed)		
PRIV_001273	Snyder, Rick	Snyder, Rick (GOV)	Jase Bolger	Muchmore, Dennis (GOV) ; Norm Saari ; Brock Swartzle	1/27/2014	Fwd: Detroit Pension Settlement - Notice - Confidential subject to Mediation Order	Mediation	
PRIV_001274	Snyder, Rick	Jase Bolger ; Snyder, Rick (GOV)	Muchmore, Dennis (GOV)	Norm Saari ; Brock Swartzle ; Gadola, Michael (GOV)	1/27/2014	Re: Detroit Pension Settlement - Notice - Confidential subject to Mediation Order		
PRIV_001275	Snyder, Rick	Gerald E. Rosen	Snyder, Rick (GOV)	Brader, Valerie (GOV); Muchmore, Dennis (GOV)	1/27/2014	Fwd: Detroit Pension Settlement - Notice - Confidential subject to Mediation Order	Mediation	
PRIV_001276	Snyder, Rick	Muchmore, Dennis (GOV)	Snyder, Rick (GOV)	Jase Bolger; Norm Saari; Brock Swartzle; Gadola, Michael (GOV); Brader, Valerie (GOV)	1/27/2014	Re: Detroit Pension Settlement - Notice - Confidential subject to Mediation Order	Mediation	
PRIV_001277	Tedder, Greg					Witness Preparation Responsibilities	Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product
PRIV_001278	Tedder, Greg	Brader, Valerie (GOV)	Tedder, Greg			RE: Detroit	Mediation	Document/email discussing a subject incident to mediation

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_001279	Tedder, Greg	Calley, Brian (GOV) ; Brader, Valerie (GOV)	Tedder, Greg	Muchmore, Dennis (GOV); Snyder, Rick (GOV); Baird, Richard (GOV); Gadola, Michael (GOV); Scott, Allison (GOV)		RE: CONFIDENTIAL AND SUBJECT TO ATTY CLIENT PRIVILEGE	Mediation	Document/email discussing a subject incident to mediation
PRIV_001280	Tedder, Greg	Snyder, Rick (GOV) ; Gadola, Michael (GOV)	Tedder, Greg	Brader, Valerie (GOV); Wurfel, Sara (GOV); Baird, Richard (GOV); Agen, Jarrod (GOV); Muchmore, Dennis (GOV); Scott, Allison (GOV); Roberts, John (GOV); Clement, Elizabeth (GOV); Wisniewski, Wendy (GOV); Priest, Chris (GOV); lukasz@paszek.com		RE: POA Message Docs	Attomey Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001281	Tedder, Greg	Thomas A Wilson	Tedder, Greg	Bruce Bennett ; Brader, Valerie (GOV) ; David G. Heiman ; Heather Lennox ; orrk@detroitmi.gov		RE: Detroit - Draft Plan/Disclosure Statement/Summary	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001282	Tedder, Greg	Brader, Valerie (GOV) ; Priest, Chris (GOV)	Tedder, Greg	Gadola, Michael (GOV)		RE: KEY ERROR IN PLAN	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001283	Tedder, Greg	adias@aragonglobal.com	Tedder, Greg			FW: Request to Discuss Detroit Art Deal - Gov. Snyder Proposal	Mediation	Document/email discussing a subject incident to mediation
PRIV_001284	Tedder, Greg	Tedder, Greg (GOV); Rustem, William (GOV); Saxton, Thomas (Treasury)	Brader, Valerie (GOV)		1/7/2014	CONFIDENTIAL AND SUBJECT TO MEDIATION.	Attorney Client Communication; Mediation	Document/email containing communication with attorney
PRIV_001285	Tedder, Greg	adias@aragonglobal.com	Tedder, Greg (GOV)		1/27/2014	FW: Request to Discuss Detroit Art Deal - Gov. Snyder Proposal	Mediation	Document/email discussing a subject incident to mediation
PRIV_001286	Tedder, Greg	Gadola, Michael (GOV) ; Muchmore, Dennis (GOV)	Tedder, Greg	Wisniewski, Wendy (GOV)		RE: City of Detroit -Confidential Mediation Communication	Attorney Client Communication; Mediation	Document/email containing communication with attorney
PRIV_001287	Tedder, Greg	Brader, Valerie (GOV)	Tedder, Greg (GOV)		12/9/2013	RE: Detroit Documents Needed - Attorney-Client Privilege and Subject to Mediation	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001288	Tedder, Greg	Muchmore, Dennis (GOV); Scott, Allison (GOV)	Tedder, Greg (GOV)	Wisniewski, Wendy (GOV) ; Brader, Valerie (GOV)	12/10/2013	FW: December 11th Governor's meeting material	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product
PRIV_001289	Tedder, Greg	Snyder, Rick (GOV)	Tedder, Greg (GOV)	Scott, Allison (GOV); Muchmore, Dennis (GOV); Roberts, John (GOV); Brader, Valerie (GOV); Gadola, Michael (GOV); Wisniewski, Wendy (GOV)	12/16/2013	Document #2 for 3:15 call	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001290	Tedder, Greg	Charles M. Moore ; Evan Miller ; Stacy Fox ; David G. Heiman	Tedder, Greg (GOV)	Оп, Kevyn	12/18/2013	Fwd: Pension leadership issue re Detroit	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001291	Tedder, Greg	Ashley Gelisse ; Priest, Chris (GOV)	Tedder, Greg (GOV)	Brader, Valerie (GOV)	12/20/2013	FW: Detroit Retiree Health Population & Medicare	Mediation	Document/email containing attorney work product
PRIV_001292	Tedder, Greg	Gelisse, Ashley (TREASURY); Saxton, Thomas (Treasury); Chris DeRose (CDeRose@mersofmich.com)	Tedder, Greg (GOV)	Brader, Valerie (GOV)	12/20/2013	FW: CONFIDENTIAL DRAFT SLIDE DECK FOR MEDIATORS – Pension POA.pptx	Mediation	Document/email containing attorney work product
PRIV_001293	Tedder, Greg	Brader, Valerie (GOV); Chris DeRose (CDeRose@mersofmich.com); Saxton, Thomas (Treasury); Gelisse, Ashley (TREASURY)	Tedder, Greg (GOV)		12/20/2013	FW: CONFIDENTIAL — subject to mediation order	Mediation	Document/email containing attorney work product
PRIV_001294	Tedder, Greg					Attachment: Cash Flow Analysis Request to Milliman	Mediation	Document/email containing attorney work product
PRIV_001295	Tedder, Greg	Baird, Richard (GOV)	Doak, James <james.doak@millerbuckfire.co m></james.doak@millerbuckfire.co 	Dillon, Andy (Treasury); Saxton, Thomas (Treasury); Stibitz, Brom (Treasury) >; Tedder, Greg (GOV); 'dgheiman@jonesday.com'; 'bbelnett@jonesday.com'; 'bbennett@jonesday.com'; Buckfire, Ken <ken.buckfire@millerbuckfire.com>; Herman, Kyle <kvie.heman@millerbuckfire.com></kvie.heman@millerbuckfire.com></ken.buckfire@millerbuckfire.com>	4/14/2013	4/14 Policy matrix for State participation coordination	Common Interest Agreement	Document/email containing communication with attorney

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PRIV_001296	Tedder, Greg					Policy Matrix for State Participation Coordination; Attachment Detroit Initiatives Matrix	Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product
PRIV_001297	Tedder, Greg	Saxton, Thomas (Treasury)	Brader, Valerie (GOV)	Tedder, Greg (GOV)	12/10/2013	CONFIDENTIAL Subject to mediation order	Mediation	Document/email containing communication with attorney
PRIV_001298	Tedder, Greg					Upon further review, this document should not have been included with privilege log. It is nonresponsive	Common Interest Agreement; Mediation	Document/email containing attorney work product
PRIV_001299	Tedder, Greg	Tedder, Greg (GOV)	Brader, Valerie (GOV)		3/25/2014	RE: CONFIDENTIAL AND SUBJECT TO MEDIATION ORDER	Mediation	Document/email containing attorney work product
PRIV_001300	Tedder, Greg	Kevyn Orr ; Bruce Bennett ; David Heiman ; Daniel T Moss <dtmoss@jonesday.com>; gshumaker@JonesDay.com; gstewart@JonesDay.com; Heather Lennox ; tfcullen@JonesDay.com; Orr, Kevyn</dtmoss@jonesday.com>	Eunice Hayes <hayese@detroitmi.gov></hayese@detroitmi.gov>	Stacy Fox ; Sonya Mays <mayss@detroitmi.gov>; Speights, Detrich (MSP) ; Tedder, Greg (GOV)</mayss@detroitmi.gov>	3/26/2014	KO - Conference Call re: Plan Litigation	Attorney Client Communication; Attorney Work Product	
PRIV_001301	Tedder, Greg	Stacy Fox; Sonya Mays <mayss@detroitmi.gov>; Tedder, Greg (GOV)</mayss@detroitmi.gov>	Bill Nowling		3/31/2014	Fwd: Detroit - Summary of Material Changes in Amended Plan	Attorney Client Communication; Common Interest Agreement	Document/email containing communication with attorney
PRIV_001302	Tedder, Greg	5.03 (4.4.7)				Attachment: Amended Plan for the Adjustment of Debts of the City of Detroit – Summary of Material Changes	Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_001303	Tedder, Greg					Attachment: Amended Plan of Adustment Overview: Estimated Percentage Recoveries	Common Interest Agreement; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_001304	Tedder, Greg					Attachment: Summary of Key Terms of Amended Plan for the Adjustment of Debts of the City of Detroit (March 31, 2014)	Common Interest Agreement; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_001305	Tedder, Greg	Tedder, Greg (GOV); Wurfel, Sara (GOV)	Bill Nowling		4/15/2014	Fwd: CONFIDENTIAL	Common Interest Agreement	Document/email containing attorney work product
PRIV_001306	Tedder, Greg	Tedder, Greg (GOV); Wurfel, Sara (GOV)	Bill Nowling		4/15/2014	POA Changes	Mediation	Document/email discussing a subject incident to mediation
PRIV_001307	Tedder, Greg	Brader, Valerie (GOV); Clinton, Kevin (TREASURY); 'lukasz@paszek.com'; Saxton, Thomas (Treasury); Stoddard, Phil (DTMB)	Tedder, Greg (GOV)		1/2/2014	RE: Detroit mediation confidential pensions	Mediation	Document/email containing communication with attorney
PRIV_001308	Tedder, Greg	Priest, Chris (GOV)	Tedder, Greg (GOV)		1/2/2014	FW: Mediation Agenda - confidential correspondence covered under mediation discussion	Mediation	Document/email containing attorney work product
PRIV_001309	Tedder, Greg					Attachment: GRS Valuation 2012	Common Interest Agreement; Mediation	Document/email containing attorney work product
PRIV_001310	Tedder, Greg					Attachment: 71st Annual Actuarial Valuation of the Police	Common Interest Agreement; Mediation	Document/email containing attorney work product
PRIV_001311	Tedder, Greg					Attachment: DGRS Freeze noCola	Common Interest Agreement; Mediation	Document/email containing attorney work product
PRIV_001312	Tedder, Greg					Attachment: PFRS Freeze noCola	Common Interest Agreement; Mediation	Document/email containing attorney work product
PRIV_001313	Tedder, Greg	Kevyn Orr	David G. Heiman		1/5/2014	FW: Sunday Moming call with Lazard and Greenhill	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001314	Tedder, Greg					Draft Discussion Materials DWSD	Mediation	Document/email discussing a subject incident to mediation
PRIV_001315	Tedder, Greg	Brader, Valerie (GOV)	Tedder, Greg (GOV)	Gadola, Michael (GOV); Clinton, Kevin (TREASURY)	1/10/2014	RE: Conditions list	Mediation	Document/email containing communication with attorney

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Data	Subject	Privilege Type	Privilege Descriptions
PRIV_001316	Tedder, Greg	Snyder, Rick (GOV); Muchmore, Dennis (GOV); Roberts, John (GOV); Brader, Valerie (GOV); 'lukasz@paszek.com'; Priest, Chris (GOV); Saxton, Thomas (Treasury); Rustem, William (GOV); Clinton, Kevin (TREASURY)	Tedder, Greg (GOV)	Wisniewski, Wendy (GOV) ; Scott, Allison (GOV)	1/13/2014	FW: Draft POA Slides	Mediation	Document/email discussing a subject incident to mediation
PRIV_001317	Tedder, Greg	Brader, Valerie (GOV); Wurfel, Sara (GOV); Muchmore, Dennis (GOV); Roberts, John (GOV)	Tedder, Greg (GOV)		1/13/2014	FW: any problem with this statement?	Mediation	Document/email discussing a subject incident to mediation
PRIV_001318	Tedder, Greg	Snyder, Rick (GOV); Muchmore, Dennis (GOV); Roberts, John (GOV)	Tedder, Greg (GOV)	Scott, Allison (GOV) ; Brader, Valerie (GOV)	1/13/2014	FW: Drafts	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001319	Tedder, Greg		·			Draft Plan of Adjustment	Common Interest Agreement; Mediation	Document/email containing attorney work product; Document/email discussing a subject incident to mediation
PRIV_001320	Tedder, Greg	Brader, Valerie (GOV); Tom Saxton; Rustern, William (GOV)	Tedder, Greg (GOV)		1/22/2014	FW: DWSD Materials	Mediation	Document/email discussing a subject incident to mediation
PRIV_001321	Tedder, Greg					Draft DWSD/GRS Discussion with EM	Mediation	Document/email discussing a subject incident to mediation
PRIV_001322	Tedder, Greg	Allard, Claire (GOV)	Tedder, Greg (GOV)		1/24/2014	Re: Detroit TPs	Mediation	Document/email discussing a subject incident to mediation
PRIV_001323	Tedder, Greg	Gadola, Michael (GOV); Lukasz Paszek; Brader, Valerie (GOV)	Tedder, Greg (GOV)		1/24/2014	Fwd: [Detroit] Summary - Plan of Adjustment	Mediation	Document/email discussing a subject incident to mediation
PRIV_001324	Tedder, Greg	Agen, Jarrod (GOV)	Tedder, Greg (GOV)		1/24/2014	Fwd: [Detroit] Summary - Plan of Adjustment	Mediation	Document/email discussing a subject incident to mediation
PRIV_001325	Tedder, Greg	Agen, Jarrod (GOV); Wurfel, Sara (GOV)	Tedder, Greg (GOV)		1/27/2014	FW: Detroit - Summary of Plan	Mediation	Document/email discussing a subject incident to mediation
PRIV_001326	Tedder, Greg	lukasz@paszek.com'; Saxton, Thomas (Treasury) ; Priest, Chris (GOV)	Tedder, Greg (GOV)	Brader, Valerie (GOV)	1/31/2014	FW: CONFIDENTIAL - Detroit - Draft Financial/Restructuring Analyses	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_001327	Tedder, Greg	VanSickle, Michele (GOV)	Tedder, Greg (GOV)		1/31/2014	FW: CONFIDENTIAL - Detroit - Draft Financial/Restructuring Analyses	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001328	Tedder, Greg	Agen, Jarrod (GOV)	Tedder, Greg (GOV)	Brader, Valerie (GOV)	2/5/2014	Re: Various stuff	Mediation	Document/email discussing a subject incident to mediation
PRIV_001329	Tedder, Greg	Brader, Valerie (GOV)	Tedder, Greg (GOV)		2/10/2014	Re: Detroit Retirees	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001330	Tedder, Greg	Priest, Chris (GOV)	Tedder, Greg (GOV)		2/10/2014	Fwd: Detroit Retirees	Mediation	Document/email discussing a subject incident to mediation
PRIV_001331	Tedder, Greg	Brader, Valerie (GOV)	Tedder, Greg (GOV)		2/20/2014	RE: POA/DS Release, Talkers and Summary	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001332	Tedder, Greg	Thomas A Wilson' ; Brader, Valerie (GOV)	Tedder, Greg (GOV)	Bruce Bennett ; Heather Lennox	2/20/2014	RE: Detroit - Draft Plan/Disclosure Statement/Summary	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email containing communication with attorney; Document/email discussing a subject incident to mediation

Privileged Bates Begin	Custodian	Email To	Email From	Email CC	Date	Subject	Privilege Type	Privilege Descriptions
PRIV_001333	Tedder, Greg	Agen, Jarrod (GOV) ; Wurfel, Sara (GOV)	Tedder, Greg (GOV)		2/20/2014	FW: Detroit - Draft Plan/Disclosure Statement/Summary	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001334	Tedder, Greg	Thomas A Wilson	Tedder, Greg (GOV)	Bruce Bennett; Brader, Valerie (GOV); Heather Lennox; orrk@detroitmi.gov; David G. Heiman	2/20/2014	Re: Detroit - Draft Plan/Disclosure Statement/Summary	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_001335	Tedder, Greg	Priest, Chris (GOV); Brader, Valerie (GOV)	Tedder, Greg (GOV)	Lukasz Paszek	2/21/2014	RE: Detroit - Draft Plan/Disclosure Statement/Summary	Mediation	Document/email discussing a subject incident to mediation
PRIV_001336	Tedder, Greg	Priest, Chris (GOV) ; Brader, Valerie (GOV)	Tedder, Greg (GOV)	Lukasz Paszek	2/21/2014	RE: Detroit - Draft Plan/Disclosure Statement/Summary	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing attorney work product; Document/email containing communication with attomey; Document/email discussing a subject incident to mediation
PRIV_001337	Tedder, Greg	Stacy Fox	Tedder, Greg (GOV)		2/24/2014	FW: City of Detroit Restructuring — Weekly E-Mail Update	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001338	Tedder, Greg	Charles M. Moore	Tedder, Greg (GOV)		2/25/2014	FW: CONFIDENTIAL AND SUBJECT TO MEDIATION ORDER	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001339	Tedder, Greg	Saxton, Thomas (Treasury); Stibitz, Brom (Treasury); Clement, Elizabeth (GOV); Brader, Valerie (GOV); Clinton, Kevin (TREASURY); Baird, Richard (GOV); Gadola, Michael	Tedder, Greg (GOV)	Scott, Allison (GOV)	3/3/2014	Post-E M Transition	Mediation	Document/email discussing a subject incident to mediation
PRIV_001340	Tedder, Greg	Brader, Valerie (GOV)	Tedder, Greg (GOV)		3/4/2014	FW: Detroit	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001341	Tedder, Greg	Liedel Steven (sliedel@dykema.com)	Tedder, Greg (GOV)		3/4/2014	FW: Detroit	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001342	Tedder, Greg	Baird, Richard (GOV); Gadola, Michael (GOV); Brader, Valerie (GOV)	Tedder, Greg (GOV)		3/14/2014	FW: DRAFT SUMMARY - Financial Control Board for City of Detroit Post-Bankruptcy NYC Model	Mediation	Document/email discussing a subject incident to mediation
PRIV_001343	Tedder, Greg	Snyder, Rick (GOV); Brader, Valerie (GOV); Baird, Richard (GOV); Muchmore, Dennis (GOV); Clement, Elizabeth (GOV)	Tedder, Greg (GOV)	Scott, Allison (GOV) ; Gadola, Michael (GOV)	3/21/2014	DRAFT SUMMARY - Financial Control Board for City of Detroit Post-Bankruptcy NYC Model	Mediation	Document/email discussing a subject incident to mediation
PRIV_001344	Tedder, Greg	Morrow, Mario (GOV)	Tedder, Greg (GOV)	Agen, Jarrod (GOV)	4/1/2014	Fwd: Detroit - Summary of Material Changes in Amended Plan	Attorney Client Communication; Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001345	Tedder, Greg	'tweber@house.mi.gov'	Tedder, Greg (GOV)		4/2/2014	CONFIDENTIAL AND SUBJECT TO MEDIATION ORDER	Mediation	Document/email discussing a subject incident to mediation
PRIV_001346	Tedder, Greg	Heather Lennox; Stacy Fox; Brader, Valerie (GOV); Gadola, Michael (GOV)	Tedder, Greg (GOV)		4/11/2014	DRAFT POA Language re oversight	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001347	Tedder, Greg	Heather Lennox	Tedder, Greg (GOV)	Gadola, Michael (GOV) ; Brader, Valerie (GOV) ; Stacy Fox ; Thomas A Wilson	4/12/2014	Re: DRAFT POA Language re oversight	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation

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PRIV_001348	Tedder, Greg	Brader, Valerie (GOV)	Tedder, Greg (GOV)		4/15/2014	FW: CONFIDENTIAL	Common Interest Agreement; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001349	Tedder, Greg	Gadola, Michael (GOV); Muchmore, Dennis (GOV)	Tedder, Greg (GOV)	Wisniewski, Wendy (GOV)	4/21/2014	RE: City of Detroit -Confidential Mediation Communication	Attorney Client Communication; Mediation	Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001350	Tedder, Greg		VanSickle, Michele (GOV) - on behalf of - Tedder, Greg (GOV)		2/10/2014	Phone call with Darin Ackerman and Dan Papineau from Sen. Brandenburg's office	Mediation	Document/email discussing a subject incident to mediation
PRIV_001351	Treasury Department Maureen Doyle					Materials Prepared for Discussion Financing Considerations	Attorney Client Communication; Common Interest Agreement; Attorney Work Product; Mediation	Document/email containing attorney work product; Document/email containing communication with attorney; Document/email discussing a subject incident to mediation
PRIV_001352	Treasury Department Tom Saxton					Upon further review, this document should not have been included with privilege log. It is nonresponsive	Common Interest Agreement	Document/email containing attorney work product
PRIV_001353	Treasury Department Tom Saxton					Memo Summary of Long Term Retireee Health Proposal	Common Interest Agreement; Attorney Work Product	Document/email containing attorney work product
PRIV_001354	Muchmore, Dennis	Snyder, Rick (GOV)	Agen, Jarrod (GOV)	Muchmore, Dennis (GOV); Scott, Allison (GOV); Wurfel, Sara (GOV); Tedder, Greg; Roberts, John (GOV); Brader, Valerie (GOV)	1/20/2014	Draft Mediation Settlement Release (JA).docx	Mediation	Document/email discussing a subject incident to mediation
PRIV_001355	Muchmore, Dennis	annivorycalvert@comcast.net	Posthumus, Dick (GOV)	Ackerman, Darin (GOV); Muchmore, Dennis (GOV)	1/23/2014	FW: Detroit Bankruptcy Settlement Proposal	Mediation	Document/email discussing a subject incident to mediation