

**BRUCE D. DAVIS and JAMES R. DAVIS,
Individually and as Personal Representatives
of the Heirs and Estate of FRANKIE GENE
DAVIS, Deceased, et al.**

VS.

Defendants.

EL PASO COUNTY, TEXAS

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES, Defendant Southwestern Bell Telephone Company and files its Response to Plaintiffs' Rule 193 Request for Privilege Log as follows:

In response to Plaintiffs' Request for Privilege Log served June 30, 2000, Southwestern Bell Telephone Company refers Plaintiffs to the Privilege Log attached hereto as Exhibit "A".

Respectfully submitted,

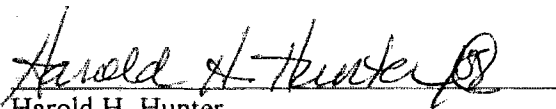
Robert E. Thackston
State Bar No. 00785487
Harold H. Hunter
State Bar No. 10300400


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**ATTORNEYS FOR DEFENDANTS
SOUTHWESTERN BELL TELEPHONE
COMPANY AND SBC
COMMUNICATIONS INC.**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above Defendant Southwestern Bell Telephone Company's Response to Plaintiffs' Request for Rule 193 Privilege Log has been sent via hand delivery and via certified mail/return receipt requested, on this 14th day of July 2000, to counsel for Plaintiffs, Stephanie A. Finch and Holly Huart, Baron & Budd, The Centrum, 3102 Oak Lawn Avenue, Suite 1100, Dallas, Texas 75219.


Harold H. Hunter

**DAVIS FIRST REQUEST FOR PRODUCTION
TO SOUTHWESTERN BELL TELEPHONE**

PRIVILEGE LOG

*Bruce D. Davis, et al. v. SWBT, et al., No. 96-3062,
County Court at Law No. 3; El Paso County, Texas
July 13, 2000*

Entry Number	Bates Number	Document Type	Date	Author(s)	Addressee(s)	Other Recipient(s)	Document Description	Basis for Assertion of Privilege
1.	001070-001077	9/10/90	Letter	Hope Thurrott	M. Merkle		Letter re: Legal issue. Network Engineering's rec. to develop written procedures for employees to follow in handling asbestos-containing central office equipment. Attached are letters from M. Merkle re. same. Interoffice communication between SWBT counsel and management regarding legal issues.	Attorney Client Privilege
2	no Bates #	Letter	8/25/98	Robert Thackston	Robert Steiger		Communication between SWBT counsel and management regarding litigation	Attorney Client Privilege
3	200/000004-000007	Letter	12/24/87	Kristi Vaiden	Mr. Woodworth		Interoffice communication between SWBT counsel and management regarding legal issues.	Attorney Client Privilege
4	200/000010	Letter	12/10/87	Christy Vaiden	Network Operations Dept.		Interoffice communication between SWBT counsel and management regarding legal issues.	Attorney Client Privilege

Entry Number	Bates Number	Document Type	Date	Author(s)	Addressee(s)	Other Recipient(s)	Document Description	Basis for Assertion of Privilege
5	200/ 000037- 200/ 000049	Letter	no info	Chuck Hill and Hope Thurrott	Procurement Administration		Communication between SWBT counsel and management regarding legal investigation.	Attorney Client Privilege
6	200/ 000038	Letter	4/10/90	Ms. Bieller	H. Thurrott		Interoffice communication between SWBT counsel and management regarding legal issues.	Attorney Client Privilege
7	200/ 000062- 200/ 000094	Letter	3/28/91	Frank Magill	S. Twillman, Procurement Administration		Communication between SWBT counsel and management discussing legal opinions.	Attorney Client Privilege
8	200/ 000095- 200/ 000097	Letter	6/18/91	Ms. Bieller	Ruth Sears		Communication between SWBT counsel and management discussing legal opinions.	Attorney Client Privilege
9	200/ 000099- 200/ 000102	Letter	10/28/91	Ruth Sears	Maureen Merkle, District Mgr.		Communication between SWBT counsel and management discussing legal opinions.	Attorney Client Privilege
10	200/ 000146- 200/ 000147	Letter	06/92	Ruth Sears	Ann Beiller, Area Mgr.		Communication between SWBT counsel and management regarding legal inquiries.	Attorney Client Privilege
11	200/ 000152	Letter	1/14/92	Ruth Sears	Ann Beiller, Area Mgr.		Interoffice communication between SWBT counsel and management regarding legal issues.	Attorney Client Privilege

Entry Number	Bates Number	Document Type	Date	Author(s)	Addressee(s)	Other Recipient(s)	Document Description	Basis for Assertion of Privilege
12	200/ 000188	Letter	11/4/92	Ms. Clark	Unknown		Communication between SWBT counsel and management regarding legal inquiries.	Attorney Client Privilege
13	200/ 000189- 200/ 000195	Letter	4/15/93	Ruth Sears	Karen Clark		Memorandum/Chart/Report prepared by counsel for litigation.	Work Product Doctrine
14	200/ 000949- 000950	Letter	10/22/86	John Rahoy	Attorneys		Interoffice communication between SWBT counsel and management regarding legal issues.	Attorney Client Privilege
15	200/ 000952- 200/ 000957	Memo	no info	Lynn Hacker, Legal Dept.	Attorneys		Interoffice communication between SWBT counsel and management regarding legal issues.	Attorney Client Privilege
16	200/ 000978	Letter	no info	Mr. Raho	Unknown		Communication between SWBT counsel and management discussing legal opinions.	Attorney Client Privilege
17	200/ 000979	Letter	7/31/87	M. Johnson	R. Young		Communication between SWBT counsel and management discussing legal opinions.	Attorney Client Privilege
18	200/ 000980- 200/ 000988	Letter	9/10/87	Chuck Hill	R. Young		Communication between SWBT counsel and management regarding legal inquiries.	Attorney Client Privilege
19	200/ 000989- 200/ 000999	Letter	9/14/87	Ronald Young	Ann Beiller		Interoffice communication between SWBT counsel and management regarding legal issues.	Attorney Client Privilege

Entry Number	Bates Number	Document Type	Date	Author(s)	Addressee(s)	Other Recipient(s)	Document Description	Basis for Assertion of Privilege
20	200/ 001000- 200/ 001031	Letter	9/22/87	Management	Ronald Young		Interoffice communication between SWBT counsel and management regarding legal issues.	Attorney Client Privilege
21	200/ 000011	Notes	no info	n/a	n/a		SWBT counsel notes regarding litigation.	Work Product Doctrine
23	200/ 000032		11/87	Mr. Kelly	Christy Vaiden		Communication between SWBT counsel and management discussing legal opinions.	Attorney Client Privilege
24	200/ 000112- 200/ 000144		9/15/92	Ruth Sears	Ann Beiler		Memorandum/Chart/Report prepared by counsel for litigation.	Work Product Doctrine
25	200/ 000204- 200/ 000205	n/a	no info	n/a	Ruth Sears		SWBT counsel notes regarding litigation.	Work Product Doctrine
26	NCPA 200/ 000477- 200/ 000478	Memo	7/2/93	Ann Bieller	Laverne Baldwin	cc: R. Sears	Interoffice communication between SWBT counsel and management regarding legal issues.	Attorney Client Privilege
27	NCPA 200/ 000479- 200/ 000481	n/a	no info	Atty	n/a		Interoffice communication between SWBT counsel and management regarding legal issues.	Attorney Client Privilege

Entry Number	Bates Number	Document Type	Date	Author(s)	Addressee(s)	Other Recipient(s)	Document Description	Basis for Assertion of Privilege
28	NCPA 200/000489-200/000504	Draft rule	no info	n/a	n/a		Interoffice communication between SWBT counsel and management regarding legal issues.	Attorney Client Privilege
29	NCPA 200/000529-200/000558	Revision	6/87	n/a	(Atty)		Interoffice communication between SWBT counsel and management regarding legal issues.	Attorney Client Privilege
30	NCPA 200/000738	Letter	10/86-12/86		Routed to Legal 12/9/86		Interoffice communication between SWBT counsel and management regarding legal issues.	Attorney Client Privilege
31	NCPA 200/000757-200/000761	Letter	11/3/86	Division Mgr. - Procurement Contracting	Division Staff Mgr.	(cc: Raal Roos, Attorney)	Interoffice communication between SWBT counsel and management regarding legal issues.	Attorney Client Privilege
32	NCPA 200/000762-200/000763	Letter	11/16/86	Raal Roos	Ann Beiller		Interoffice communication between SWBT counsel and management regarding legal issues.	Attorney Client Privilege
33	NCPA 200/000765	Letter	11/30/86	Management	Division Staff Manager	(cc: Raal Roos, Attorney)	Interoffice communication between SWBT counsel and management regarding legal issues.	Attorney Client Privilege
34	NCPA 200/000951	Notes (hand-written)	no info	Raal Roos	Frank Magle		SWBT counsel notes regarding litigation.	Work Product Doctrine

Entry Number	Bates Number	Document Type	Date	Author(s)	Addressee(s)	Other Recipient(s)	Document Description	Basis for Assertion of Privilege
35	NCPA 200/ 001357	Notes	11/30/94	n/a	n/a		SWBT counsel notes regarding litigation.	Work Product Doctrine
36	300/ 000001- 300/ 000243	Letter	9/4/98	Robert Thackston	J.M. Degen Associates		Communication between SWBT counsel and outside counsel regarding litigation.	Attorney Client Privilege
37		E-mails	1997	Stephanie Sender	Robert Steiger		Interoffice Communication between SWBT counsel regarding litigation.	Attorney Client Privilege
38	500/ 000001- 500/ 000053	E-mails	no info	n/a	n/a		Interoffice communication between SWBT counsel and management regarding litigation.	Attorney Client Privilege
39	800\ 000001- 800\ 000009	Notes	10/13/97	n/a	Robert Steiger		SWBT counsel notes regarding litigation.	Work Product Doctrine
40	800\ 000010- 800\ 000021	Letter	10/28/97	Robert Steiger	Charlie Davidson		Interoffice communication between SWBT counsel and management regarding legal issues.	Attorney Client Privilege
41	800\ 000022- 800\ 000029	Facsimile	5/29/97	Robert Steiger	Y. Lopez		Communication between SWBT counsel and management regarding legal investigation.	Attorney Client Privilege
42	800\ 000030- 800\ 000031	Letter	2/13/97	Robert Steiger	Charlie Davidson		Interoffice communication between SWBT counsel and management regarding litigation.	Attorney Client Privilege

Entry Number	Bates Number	Document Type	Date	Author(s)	Addressee(s)	Other Recipient(s)	Document Description	Basis for Assertion of Privilege
43	800\ 000032-800\ 000036	Letter	2/5/97	Charlie Davidson	Stephanie Sendemer		Interoffice communication between SWBT counsel and management regarding litigation.	Attorney Client Privilege
44	800\ 000038-800\ 000042	Internal Corr.	1997	Charles Davidson	Robert Steiger		Interoffice communication between SWBT counsel and management regarding litigation.	Attorney Client Privilege
45	800\ 000043-800\ 000047	Letter	12/24/97	Robert Steiger	Toby Neely		Interoffice communication between SWBT counsel and management regarding legal issues.	Attorney Client Privilege
46	800\ 000078-800\ 000085	Fax	1/12/98	Robert Steiger	Charlie Davidson		Interoffice communication between SWBT counsel and management regarding legal issues.	Attorney Client Privilege
47	800\ 000086-800\ 000089	Fax	1/13/98	Robert Steiger	Toby Neely		Interoffice communication between SWBT counsel and management regarding legal issues.	Attorney Client Privilege
48	900\ 000001-900\ 000020	Documents	10/11/95	n/a	n/a		Interoffice communication between SWBT counsel and management regarding litigation.	Attorney Client Privilege
49	110\ 000001-110\ 000007	E-mails/ Notes	no info	Karen Clark	Robert Steiger		Interoffice communication between SWBT counsel and management regarding legal issues.	Attorney Client Privilege

Entry Number	Bates Number	Document Type	Date	Author(s)	Addressee(s)	Other Recipient(s)	Document Description	Basis for Assertion of Privilege
50	110\ 000021-1110\ 000025	Correspondence	12/95	Robert Steiger	Patricia Nobles		Communication between SWBT counsel and management regarding legal investigation.	Attorney Client Privilege
51	110\ 000026-1110\ 000039	Letter	6/4/97	Robert Steiger	Patricia Nobles		Communication between SWBT counsel and management regarding legal investigation.	Attorney Client Privilege
52	130\ 000001-130\ 000388	Letter	12/31/97	Robert Steiger	Lee Johnson		Communication between SWBT counsel and management regarding legal investigation.	Attorney Client Privilege
53	140\ 000001-140\ 000025	Letter	10/10/95	Stephanie Senderner	Pete Campos, Mgr. - Design & Construction		Interoffice communication between SWBT counsel and management regarding litigation.	Attorney Client Privilege
54	140\ 000027-140\ 000276	Letter	12/5/95	Robert Steiger	Pete Campos, Mgr. - Design & Construction		Interoffice communication between SWBT counsel and management regarding litigation.	Attorney Client Privilege
55	140\ 000277	Notes (hand-written)	10/21/97	n/a	Robert Steiger		SWBT counsel notes regarding litigation.	Work Product Doctrine
56	150\ 000001-150\ 000144	Letter	12/6/95	Robert Steiger	J. Long		Interoffice communication between SWBT counsel and management regarding litigation.	Attorney Client Privilege
57	No Bates Number	Letter	8/28/98	Robert Thackston	Robert Steiger		Communication between SWBT counsel and outside counsel regarding litigation.	Attorney Client Privilege

Entry Number	Bates Number	Document Type	Date	Author(s)	Addressee(s)	Other Recipient(s)	Document Description	Basis for Assertion of Privilege
58	400/ 000011- 400/ 000228	Letter	12/3/98	Robert Thackston	Robert Steiger		Communication between SWBT counsel and outside counsel regarding litigation.	Attorney Client Privilege
59	400/ 000241- 400/ 000395	Letter	12/7/98	Lisa Kaplan	Robert Steiger		Communication between SWBT counsel and outside counsel regarding litigation.	Attorney Client Privilege
60	400/ 000013- 000019 and 400/ 000234- 000240 (000234- 000240 are dup- licates)	Notes (hand-written)	no info	n/a	Robert Steiger		SWBT counsel notes regarding litigation.	Work Product Doctrine
61	No Bates number	E-mail	no info	Robert Thackston	Lisa Kaplan		Interoffice Communication between outside counsel regarding litigation.	Attorney Client Privilege
62	No Bates number	Chart	no info	n/a	n/a		Memorandum/Chart/Report prepared by counsel for litigation.	Work Product Doctrine
63	No Bates number	Letter	8/28/98	Robert E. Thackston	Robert Steiger		Communication between SWBT counsel and outside counsel regarding litigation.	Attorney Client Privilege

Entry Number	Bates Number	Document Type	Date	Author(s)	Addressee(s)	Other Recipient(s)	Document Description	Basis for Assertion of Privilege
64	160\ 00001-160\ 000013	Letter	no info	n/a	n/a		Interoffice communication between SWBT counsel and management regarding litigation.	Attorney Client Privilege
66	160\ 000014-160\ 000030	Notes	no info	n/a	Robert Steiger		SWBT counsel notes regarding litigation.	Work Product Privilege
67	160\ 000031-160\ 000098	Letter	No info	n/a	n/a		Interoffice communication between SWBT counsel and management regarding litigation.	Attorney Client Privilege
68	160\ 000099-160\ 000101	E-mail	5/17/94	Carl Greenburg	Donna Geisler		Interoffice communication between SWBT counsel and management regarding litigation.	Attorney Client Privilege
69	160\ 000102-160\ 000103.1	Notes (hand-written)	11/8/83	n/a	n/a		SWBT counsel notes regarding litigation.	Work Product Doctrine
70	160\ 000110-160\ 000123	Letter	no info	n/a	R. Steiger		Interoffice communication between SWBT counsel and management regarding litigation.	Attorney Client Privilege
71	160\ 000124-160\ 000145	Notes (hand-written)	no info	n/a	Robert Steiger		SWBT counsel notes regarding litigation.	Work Product Doctrine

Entry Number	Bates Number	Document Type	Date	Author(s)	Addressee(s)	Other Recipient(s)	Document Description	Basis for Assertion of Privilege
72	160\ 000146-160\ 000162	Internal Corr.	no info	n/a	Counsel		Interoffice communication between SWBT counsel and management regarding litigation.	Attorney Client Privilege
73	160\ 000163-160\ 000170	Notes (hand-written)	6/9/97	n/a	n/a		SWBT counsel notes regarding litigation.	Work Product Doctrine
74	160\ 000171-160\ 000172	Internal Corr.	no info	n/a	n/a		Interoffice communication between SWBT counsel and management regarding litigation.	Attorney Client Privilege
75	160\ 000173-160\ 000175	Notes (hand-written)	6/11/97	n/a	Robert Steiger		SWBT counsel notes regarding litigation.	Work Product Doctrine
76	160\ 000176-160\ 000188	Internal Corr.	no info	n/a	n/a		Interoffice communication between SWBT counsel and management regarding litigation.	Attorney Client Privilege
77	160\ 000189-160\ 000199	Notes (hand-written)	6/13/97	n/a	Robert Steiger		SWBT counsel notes regarding litigation.	Work Product Doctrine
78	160\ 000200-160\ 000207	Notes	11/18/97	n/a	Robert Steiger		SWBT counsel notes regarding litigation.	Work Product Doctrine

Entry Number	Bates Number	Document Type	Date	Author(s)	Addressee(s)	Other Recipient(s)	Document Description	Basis for Assertion of Privilege
79	160\ 000228-160\ 000240	Letter	no info	n/a	n/a		Interoffice communication between SWBT counsel and management regarding litigation.	Attorney Client Privilege
80	170\ 000001-170\ 000023	Notes	1997	n/a	Robert Steiger		SWBT counsel notes regarding litigation.	Work Product Doctrine
81	180\ 000001-180\ 000044	Letters	1997	Robert Steiger	Gladys Haecker, Mgr., Safety and Health		Interoffice communication between SWBT counsel and management regarding legal issues.	Attorney Client Privilege
82	190\ 000001-190\ 000192	Notes (hand-written)	10/13/95	n/a	Robert Steiger		SWBT counsel notes regarding litigation.	Work Product Doctrine
83	210\ 000001-210\ 000011	Notes	12/6/95	n/a	Robert Steiger		SWBT counsel notes regarding litigation.	Work Product Doctrine
84	220\ 000001-220\ 000051	E-mails	2/21/97	n/a	R. Steiger		Interoffice communication between SWBT counsel and management regarding litigation.	Attorney Client Privilege
85	220\ 000052-220\ 000176	Summary	no info	R. Steiger	n/a		Interoffice communication between SWBT counsel and management regarding litigation.	Attorney Client Privilege

Entry Number	Bates Number	Document Type	Date	Author(s)	Addressee(s)	Other Recipient(s)	Document Description	Basis for Assertion of Privilege
86	230\ 000001- 230\ 000122	Summary	no info	n/a	n/a		Interoffice communication between SWBT counsel and management regarding litigation.	Attorney Client Privilege
87	240\ 000001- 240\ 000101	Letters	Robert Steiger		n/a		Interoffice communication between SWBT counsel and management regarding litigation.	Attorney Client Privilege
88	250\ 000001- 250\ 000262	Letter	no info	n/a	n/a		Interoffice communication between SWBT counsel and management regarding litigation.	Attorney Client Privilege
89	260\ 000001- 260\ 000010	Letter	no info	n/a	n/a		Interoffice communication between SWBT counsel and management regarding litigation.	Attorney Client Privilege
90	270\ 000001- 320\ 000056	Letter	no info	n/a	n/a		Interoffice communication between SWBT counsel and management regarding litigation.	Attorney Client Privilege
91	330/ 000001- 330/ 000026	Chart	no info	n/a	n/a		Memorandum/Chart/Report prepared by counsel for litigation.	Work Product Doctrine
92	340\ 000001- 340\ 000005	Notes	1992	n/a	n/a		SWBT counsel notes regarding litigation.	Work Product Doctrine
93	340\ 000006- 340\ 000008	Notes	1994	n/a	n/a		SWBT counsel notes regarding litigation.	Work Product Doctrine

Entry Number	Bates Number	Document Type	Date	Author(s)	Addressee(s)	Other Recipient(s)	Document Description	Basis for Assertion of Privilege
94	360\ 000001-000006	Letter	9/3/80	Real Estate and Property Mgmt. Group	Division Staff Supervisor		Communication between SWBT counsel and management regarding legal investigation.	Attorney Client Privilege
95	No Bates Number	Letter	9/16/98	Robert Thackston	Lucent Technologies		Communication between SWBT counsel and outside counsel regarding litigation.	Attorney Client Privilege
96	380/ 000001-380/ 000123	Letter	10/19/98	Robert Thackston	Robert Steiger		Communication between SWBT counsel and outside counsel regarding litigation.	Attorney Client Privilege
97	No Bates Number	E-mails	no info	Robert Thackston	Lisa Kaplan		Interoffice Communication between outside counsel regarding litigation.	Attorney Client Privilege
98	No Bates Number	Letter	no info	Robert Thackston	Morton Corn		Communication between SWBT counsel and outside counsel regarding litigation.	Attorney Client Privilege
99	400/ 000241-400/ 000244	E-mails	5/97	Robert Dyson	Stephanie Sendermer		Interoffice communication between SWBT counsel and management regarding litigation.	Attorney Client Privilege
100	400/ 000413-400/ 000419 (Doc. #15 is missing)	Notes (hand-written)	no info	n/a	Robert Steiger		SWBT counsel notes regarding litigation.	Work Product Doctrine

Entry Number	Bates Number	Document Type	Date	Author(s)	Addressee(s)	Other Recipient(s)	Document Description	Basis for Assertion of Privilege
101	400/ 000234- 400/ 000240	Notes (hand-written)	10/23/98	n/a	Robert Steiger		SWBT counsel notes regarding litigation.	Work Product Doctrine
102	200/ 000001	Letter	5/27/97	Robert Steiger	Vanessa Keith		Interoffice communication between SWBT counsel and management regarding litigation.	Attorney Client Privilege
103	280/ 000002- 280/ 000145	Summary	no info	Attorney	n/a		Interoffice communication between SWBT counsel and management regarding litigation.	Attorney Client Privilege
104	370/ 000001- 370/ 000280	Letter	9/16/___	Robert Thackston	Lucent Technologies		Communication between SWBT counsel and outside counsel regarding litigation.	Attorney Client Privilege
105	No Bates Number	Memo	11/12/98	Robert Thackston, et al.	Lisa Kaplan		Interoffice Communication between outside counsel regarding litigation.	Attorney Client Privilege
106	No Bates Number	E-mail	11/24/98	Robert Thackston	Lisa Kaplan		Interoffice Communication between outside counsel regarding litigation.	Attorney Client Privilege