

IN RE: ALL GOLDENBERG, MILLER, HELLER & ANTOGNILI, P.C., ASBESTOS CASES
GENERAL MOTORS CORPORATION'S PRIVILEGE LOG
SUBJECT TO 4/25/2006 ORDER

Doc	DATE	TO/FROM	DESCRIPTION OR SUBJECT MATTER	PURPOSE OF DOCUMENT	PRIVILEGE CLAIM
PRIV000001-000003	09/17/2002	To: Darrell Grams, Esq. Glenn Jackson, Esq. William McLellan, Esq.	Confidential draft memoranda from expert consultant to legal staff attorneys memorializing scope of litigation strategy tasks, ongoing work and budgets related to defending ongoing, pending and potential litigation matters.	To set forth litigation strategy tasks to assist in ongoing, pending and prospective litigation.	Attorney-Client Privilege Attorney Work Product Joint Defense Privilege
PRIV000004-000019	05/07/2003	To: Samina R. Schey, Esq. Glenn Jackson, Esq. Darrell Grams, Esq. Bill McLellan, Esq. Mike Sullivan, Esq. From: Patrick Sheehan	Confidential correspondence from expert consultant to legal staff attorneys describing litigation strategy tasks and budgets for proposed and ongoing work related to defending ongoing, pending and potential litigation.	To set forth litigation strategy tasks to assist in ongoing, pending and prospective litigation.	Attorney-Client Privilege Attorney Work Product Joint Defense Privilege
PRIV000020-000045	07/22/2003	To: Samina R. Schey, Esq. Glenn Jackson, Esq. Darrell Grams, Esq. Bill McLellan, Esq. Mike Sullivan, Esq. From: Patrick Sheehan	Confidential correspondence, from expert consultant to legal staff attorneys describing litigation strategy tasks and budgets for proposed and ongoing work related to defending ongoing, pending and potential litigation.	To set forth litigation strategy tasks to assist in ongoing, pending and prospective litigation.	Attorney-Client Privilege Attorney Work Product Joint Defense Privilege

Doc	DATE	TO/FROM	DESCRIPTION OR SUBJECT MATTER	PURPOSE OF DOCUMENT	PRIVILEGE CLAIM
PRIV000046-000047	4/26/06	To: Thomas Dutton, Esq. From: Patrick Sheehan	Transmittal Form to GM counsel from consulting expert regarding memo to legal staff counsel regarding correspondence from expert consultant to legal staff attorneys describing litigation strategy tasks and budgets for proposed and ongoing work related to defending ongoing, pending and potential litigation.	To set forth litigation strategy tasks to assist in ongoing, pending and prospective litigation.	Attorney-Client Privilege Attorney Work Product Joint Defense Privilege

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